

TSD File Inventory Index

Date: January 9, 2001

Initial: CM/Genevieve

Facility Name: <u>Titanium Batch Operation of Lorraine (W. Fel. L. L. L.)</u>		
Facility Identification Number: <u>CHD 098 435 134</u>		
A.1 General Correspondence	Y	B.2 Permit Docket (B.1.2)
A.2 Part A / Interim Status	Y	.1 Correspondence
.1 Correspondence	Y	.2 All Other Permitting Documents (Not Part of the ARA)
.2 Notification and Acknowledgment	Y	C.1 Compliance - (Inspection Reports)
.3 Part A Application and Amendments	Y	C.2 Compliance/Enforcement
.4 Financial Insurance (Sudden, Non Sudden)	Y	.1 Land Disposal Restriction Notifications
.5 Change Under Interim Status Requests	Y	.2 Import/Export Notifications
.6 Annual and Biennial Reports	Y	C.3 FOIA Exemptions - Non-Releaseable Documents
A.3 Groundwater Monitoring	Y	D.1 Corrective Action/Facility Assessment
.1 Correspondence	Y	.1 RFA Correspondence
.2 Reports	Y	.2 Background Reports, Supporting Docs and Studies
A.4 Closure/Post Closure	Y	.3 State Prelim. Investigation Memos
.1 Correspondence	Y	.4 RFA Reports
.2 Closure/Post Closure Plans, Certificates, etc	Y	D. 2 Corrective Action/Facility Investigation
A.5 Ambient Air Monitoring	Y	.1 RFI Correspondence
.1 Correspondence	Y	.2 RFI Workplan
.2 Reports	Y	.3 RFI Program Reports and Oversight
B.1 Administrative Record	Y	.4 RFI Draft /Final Report

Total - 1

.5 RFI QAPP		.7 Lab data, Soil Sampling/Groundwater	
.6 RFI QAPP Correspondence		.8 Progress Reports	
.7 Lab Data, Soil-Sampling/Groundwater		D.5 Corrective Action/Enforcement	
.8 RFI Progress Reports		.1 Administrative Record 3008(h) Order	
.9 Interim Measures Correspondence		.2 Other Non-AR Documents	
.10 Interim Measures Workplan and Reports		D.6 Environmental Indicator Determinations	
D.3 Corrective Action/Remediation Study		.1 Forms/Checklists	
.1 CMS Correspondence		E. Boilers and Industrial Furnaces (BIF)	
.2 Interim Measures		.1 Correspondence	
.3 CMS Workplan		.2 Reports	
.4 CMS Draft/Final Report		F Imagery/Special Studies (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)	X
.5 Stabilization		G.1 Risk Assessment	
.6 CMS Progress Reports		.1 Human/Ecological Assessment	
.7 Lab Data, Soil-Sampling/Groundwater		.2 Compliance and Enforcement	
D.4 Corrective Action Remediation Implementation		.3 Enforcement Confidential	
.1 CMI Correspondence		.4 Ecological - Administrative Record	
.2 CMI Workplan		.5 Permitting	
.3 CMI Program Reports and Oversight		.6 Corrective Action Remediation Study	
.4 CMI Draft/Final Reports		.7 Corrective Action/Remediation Implementation	
.5 CMI QAPP		.8 Endangered Species Act	
.6 CMI Correspondence		.9 Environmental Justice	

Note: Transmittal Letter to Be Included with Reports:

Comments: Documents do not justify individual/prior/schedule

**A.1 Public
Participation**

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: Sept. 28, 1984

SUBJECT: End of Comment Period-TIMET METALS' Change of Status
Toronto, OH

FROM: Christine Klemme, EPA
RAIU

Ch

TO: Becky Strom

The comment period ended for Timet Metals on Sept. 24, 1984.

There were no comments received.

PUBLIC VOUCHER FOR ADVERTISING

DEPARTMENT OR ESTABLISHMENT, BUREAU OR OFFICE

U.S. Environmental Protection Agency-Waste Management Branch

PLACE VOUCHER PREPARED 5HW-13
230 S. Dearborn, Chicago, IL 60604

DATE PREPARED
8/10/84

For Agency Use Only

VOUCHER NUMBER

SCHEDULE NUMBER

NAME OF PUBLICATION

oronto (ohio) TRIBUNE

NAME OF PUBLISHER OR REPRESENTATIVE

Toronto Tribune, Publisher

ADDRESS (Street, room number, city, State, and ZIP code)

118 S. Fourth St.
Toronto, Oh 43964

ATTN: Nancy Beswick, Display Ads

(614) 537-1531

CHARGES

TYPEFACE	(size of type)	POINT PER	(inch, square, word, or folio)
	NUMBER OR LINES (Indicate counted or space)	COST PER LINE	TOTAL COST
Line Rates	FIRST INSERTION	\$	\$
	ADDITIONAL INSERTIONS GIVE NUMBER ▶		
	TOTAL		\$
Other Rates	NUMBER OF UNITS (Indicate inch, square, word, folio)	COST PER UNIT	TOTAL COST
	FIRST INSERTION	\$	\$
	ADDITIONAL INSERTIONS GIVE NUMBER ▶		
	TOTAL		\$
Each one copy of advertisement (including upper and lower rules) to each copy of voucher here. If copy is not available sign the following affidavit.		TOTAL LINE RATES AND OTHER RATES	
		LESS DISCOUNT AT %	
		BALANCE DUE	\$
		VERIFIED (Initials)	

AFFIDAVIT

This represents a true billing for the attached advertising order, with specifications and copy, which has been completed.

SIGNATURE OF PUBLISHER OR REPRESENTATIVE

TITLE

DATE

FOR AGENCY USE ONLY

ADVERTISEMENT PUBLISHED IN	DATE PUBLISHED
I certify that the advertisement described above appeared in the named publication and that this account is correct and eligible for payment.	
SIGNATURE AND TITLE OF CERTIFYING OFFICER	DATE
SIGNATURE AND TITLE OF AUTHORIZING OFFICER	DATE
ACCOUNTING CLASSIFICATION DISPLAY AD with Affidavit \$ 150.00 2540 2TN302 4A4E05\$002	\$2.80 per column inch 6840200
PAID BY CHECK NUMBER	

1 If the ability to certify and authority to approve are combined in one person enter "N/A" (not applicable) here.

★ U.S. GPO: 1974-555-598 8/13

DEPARTMENT OR ESTABLISHMENT, BUREAU OR OFFICE

U.S. Environmental Protection Agency-Waste Management Branch

DATE 8/10/84

The publisher of the publication named below is authorized to publish the enclosed advertisement according to the schedule below provided the rates are not in excess of the commercial rates

charged to private individuals with the usual discounts. It is to be set solid, without paragraphing, and without any display in the heading unless otherwise expressly authorized in the specifications.

NAME OF THE PUBLICATION ADVERTISED IN

Toronto (Ohio) Tribune

SUBJECT OF ADVERTISEMENT

Public Notice

EDITION OF PAPER ADVERTISEMENT APPEARED

prints once a week- THURSDAY

NUMBER OF TIMES ADVERTISEMENT APPEARED

One Time

DATE(s) ADVERTISEMENT APPEARED

Thursday, August 23, 1984

SPECIFICATIONS FOR ADVERTISEMENT

Please place in legal notice/classified section

yes per N. Beavril

COPY FOR ADVERTISEMENT

See attached

AUTHORITY TO ADVERTISE		INSTRUMENT OF ASSIGNMENT	
NUMBER	51831NALT	NUMBER	
DATE	August 13, 1984	DATE	
SIGNATURE OF AUTHORIZING OFFICIAL	<i>Brigitte Mancke</i>	TITLE	

INSTRUCTIONS TO PUBLISHERS

Extreme care should be exercised to insure that the specifications for advertising to be set other than solid be definite, clear, and specific since no allowance will be made for paragraphing or for display or leaded or prominent headings, unless specifically ordered, or for additional space required by the use of type other than that specified. Specifications for advertising other than solid and the advertisement copy submitted to the publisher will be attached to the voucher. The following is a sample of solid line advertisement set up in accordance with the usual Government requirements.

DEPARTMENT OF HIGHWAYS & TRAFFIC,
D.C. Bids are requested for first spring 1966 cement concrete repair contract, including incidental work, Washington, D.C., Invitation No. C-5576-H, consisting of 11,000 sq. yds. PCC Class BB sidewalk repair and 2,000 cu. yds. PCC Class A pavement, alley, & driveway repair, both cut repairs only. Bidding material available from the Procurement Officer, D.C. Sealed bids to be opened in the Procurement Office at 3:00 p.m., November 15, 1965.

Your bill for this advertising order should be submitted on the "Public Voucher for Advertising" form, which is printed on the reverse of this form, immediately after the last publication of the advertisement. If copies of the printed advertisement are not available, complete the affidavit provided on the voucher. Submit the voucher and a copy of the printed advertisement to ►
U.S. Environmental Protection Agency
230 S. Dearborn
Financial Operations Section
Chicago, IL 60604

IMPORTANT

Charges for advertising when a cut, matrix, stereotype or electrotype is furnished will be based on actual space used and no allowance will be made for shrinkage.

In no case shall the advertisement extend beyond the date and edition stated in this order.



PUBLIC NOTICE

PUBLIC NOTICE

The United States Environmental Protection Agency (U.S. EPA) has received a certification of change in status from TIMET Metals, located

at 100 Titanium Way, P.O. Box 309, Toronto, Ohio. TIMET stored hazardous (as defined by federal law) waste in containers. This action will change the status of TIMET from a storage facility to a generator storing for fewer than 90 days (per 40 CFR 262.34). The status change for this facility was effected by removing hazardous waste stored for longer than 90 days and by limiting the present accumulation period to fewer than 90 days. The facility will be subject to the special provisions of 40 CFR 261.5 for small quantity generators in any calendar month if it generates less than 1000 kilograms of hazardous waste in that month.

The certification of change in status was submitted to satisfy regulations promulgated under the Resource Conservation and Recovery Act, as amended. U.S. EPA required the certification of change in status when TIMET requested a change in status from a storage facility to a small quantity generator.

The certification and related background materials are available to the public at U.S. EPA, Waste Management Branch, 230 South Dearborn Street, 13th Floor, Chicago, Illinois 60604, (312) 886-3851 from 8:30 a.m. to 4:30 p.m., Monday through Friday. These materials also may be seen during business hours at the Ohio Environmental Protection Agency's Southeast District Office, 2195 Front Street, Logan, Ohio 43138, (614) 385-8501.

Public comments concerning the certification of this action are invited by U.S. EPA and will be accepted through September 24, 1984. Please send comments to:

U.S. Environmental Protection Agency; 230 South Dearborn Street; 5HW-13; Chicago, Illinois 60604; ATTN: Christine Klemme.

ADV. Toronto Tribune
August 23, 1984

Christine Klemme

PUBLIC NOTICE

The United States Environmental Protection Agency (U.S. EPA) has received a certification of change in status from TIMET Metals, located at 100 Titanium Way, P.O. Box 309, Toronto, Ohio. TIMET stored hazardous (as defined by federal law) waste in containers. This action will change the status of TIMET from a storage facility to a generator storing for fewer than 90 days (per 40 CFR 262.34). The status change for this facility was effected by removing hazardous waste stored for longer than 90 days and by limiting the present accumulation period to fewer than 90 days. The facility will be subject to the special provisions of 40 CFR 261.5 for small quantity generators in any calendar month if it generates less than 1000 kilograms of hazardous waste in that month.

The certification of change in status was submitted to satisfy regulations promulgated under the Resource Conservation and Recovery Act, as amended. U.S. EPA required the certification of change in status when TIMET requested a change in status from a storage facility to a small quantity generator.

The certification and related background materials are available to the public at U.S. EPA, Waste Management Branch, 230 South Dearborn Street, 13th Floor, Chicago, Illinois 60604, (312) 886-3715, from 8:30 a.m. to 4:30 p.m., Monday through Friday. These materials also may be seen during business hours at the Ohio Environmental Protection Agency's Southeast District Office, 2195 Front Street, Logan, Ohio 43138, (614) 385-8501.

Public comments concerning the certification or this action are invited by U.S. EPA and will be accepted through September 24, 1984. Please send comments to:

U.S. Environmental Protection Agency
230 South Dearborn Street
5HW-13
Chicago, Illinois 60604
ATTN: Christine Klemme

VERIFICATION OF RECEIPT OF PUBLIC REVIEW MATERIALS

NAME OF LIBRARY CONTACT, LIBRARY AND LOCATION:

Ohio Environmental Protection Agency
Southeast District
ATTN: Robert Cottrill
2195 Front
Logan, OH 43138

FACILITY NAME, LOCATION AND ID #:

TIMET METALS 100 Titanium Way
OHD098435134
Toronto, Ohio

MATERIALS RECEIVED:

Closure and related background material
Public notice

DATE RECEIVED/MADE AVAILABLE TO PUBLIC:

SIGNATURE OF RECEIVING PARTY:

Bob Cottrill

PLEASE RETURN (IN SELF-ADDRESSED, POSTAGE AND FEES PAID, ENVELOPE) TO:

U.S. Environmental Protection Agency
5HW-13
230 S. Dearborn Street
Chicago, IL 60604

Attention: Christine Klemme

RECEIVED
AUG 21 1984
WASTE MANAGEMENT
BRANCH

hazardous • waste • facility • approval • board

Richard F. Celeste, Governor
Robert H. Maynard, Chairman

hwfab

P.O. Box 1049
361 E. Broad St.
Columbus, Ohio 43216
(614) 462-6981

RECEIVED
OHIO EPA

JAN 10 1984

January 9, 1984

DIV. HAZARDOUS
MATERIALS MANAGEMENT

Mr. T.J. Kucherawy
TIMET
100 Titanium Way, P.O. Box 309
Toronto, Ohio 43964

Dear Mr. Kucherawy:

This correspondence acknowledges our receipt of the Board certified copy of the hazardous waste permit originally issued to your facility.

The permit (#04-41-0565) is considered to be withdrawn at your request and therefore is no longer valid.

If you have any questions concerning your permit, please do not hesitate to contact me.

Sincerely,



Philbin L. Scott
Technical Advisor

PLS/dmc

cc: Tom Crepeau, Ohio EPA DHMM
Facility File

TIMET

100 TITANIUM WAY, P.O. BOX 309
TORONTO, OHIO • (614) 537-1571

January 5, 1983

Jim Flautt
Ohio E.P.A.
Div. Hazard Materials
361 E. Broad Street
Columbus, Ohio 43215

Dear Jim:

This letter is in reference to our phone conversation on 1/4/83 and my letter to the U.S. E.P.A. dated 11/29/82.

As per our conversation, Timet will not be a hazardous waste storage site due to changes in policy and processes.

Please remove Timet from the O.E.P.A. list of hazardous waste storage sites; the I.D. reference number is OHT400011946. *04D098435134*

If you have any questions feel free to contact me at 614-537-1571, extension 322.

Sincerely,

T. Kucherauw / la
T. Kucherauw

TK/la

cc: C. Busby
F. Steinberg

RECEIVED
OHIO EPA

JAN 7 1983

**DIV. HAZARDOUS
MATERIALS MANAGEMENT**

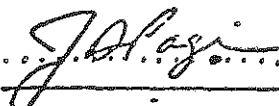
Facility Name:	TIMET
Facility Location:	TORONTO, OHIO
Mailing Address:	100 Titanium Way Toronto, Ohio 43964
U.S. EPA ID No.:	OHT 400 011 946

1. I certify, in reference to the above-named facility, that a complete and accurate description of the activities currently conducted, for purposes of the Resource Conservation and Recovery Act (RCRA), are those of a generator accumulating waste on-site in compliance with 40 CFR 262.34. This description of activities shall be considered effective as of

6-1-83

(please type in above: today's date, or other appropriate past date)

2. I certify that all hazardous wastes which had been stored at this facility for greater than 90 days have been permanently removed and -- for that portion of the wastes that were present on-site on or after November 19, 1980 -- the manifest requirements of 40 CFR Part 262 have been complied with, and all manifests are on file at this facility, available for inspection by authorized State and Federal officials.
3. I finally certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

	Vice President	6-1-83
---	----------------	--------

Signature

Typed Name and Title

Date

J. D. Page - Vice President - Mill Operations 6/1/83

(Please have appropriate official, per 40 CFR 122.6, sign and date)

Ohio EPA

RECEIVED
OHIO EPA

SEP 6 1983

CERTIFICATION STATEMENTDIV. HAZARDOUS
MATERIALS MANAGEMENT

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Permit Appl. No. 04-41-0565TIMET

Facility Name

J. D. Page
Signature of Executive Officer

Vice President
Title

August 30, 1983
Date

WHO SHOULD SIGN THE CERTIFICATION STATEMENT?

- A. For a corporation: By a principal executive officer of at least the level of vice president;
- B. For partnership or sole proprietorship: By a general partner or the proprietor, respectively; or
- C. For a municipality, State, Federal or other public facility: By either a principal executive officer or ranking elected official.

Note: Establishment of a hazardous waste facility without an effective permit is prohibited pursuant to Sections 3734.02 and 3734.11 of the Ohio Revised Code.

0427R



INTER-OFFICE COMMUNICATION

ND 2 JACK

TO: Tom Carlisle, Division of Hazardous Materials DATE: January 12, 1983

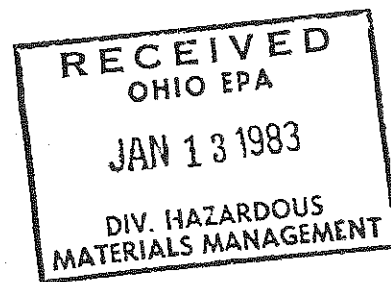
FROM: Mike Moschell, thru Pat Gorman, SEDO Management

SUBJECT: TITANIUM METALS/TIMET PERMIT WITHDRAWAL REQUEST

In reference to Timet's request of November 29, 1982, to USEPA to withdraw their storage permit, the activities at Timet include storage of spent pickling acids in tanks, and spent solvent and caustics in drums. From my inspection in April, 1982, it appeared Timet was removing acids weekly and drums every 2 - 3 months due to volume produced. I can see no need for closure of tank or drum storage areas, since these will continue to be used for storage of less than 90 days. Please call if you have any questions.

MM:dm

cc: Paula Cotter, DHMM, C.O.



**A.2 Part A/
Interim Status**



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149
(614) 644-3020
FAX (614) 644-2329

RECEIVED
WMD RCRA
RECORD CENTER

MAY 14 1993

George V. Voinovich
Governor

Donald R. Schregardus
Director

April 20, 1993

Titanium Metals Corporation Timet Division
Attn: Harry Turic
100 Titanium Way
Toronto, OH 43964

Now reg

RE: EPA ID#: OHD098435134

LOCATION of INSTALLATION: 100 Titanium Way
Toronto, OH 43964

In response to your request of March 1993 the following information has been updated:

Contact: Harry Turic (614)537-5775

If you have any questions, please contact Beth Barrett at (614)644-2977.

Sincerely,

Thomas E. Crepeau

Thomas E. Crepeau, Manager
Data Management Section
Division of Hazardous Waste Management

TEC/bab

cc: U.S. EPA, Region V
Ohio EPA District Office



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:

RCRA ACTIVITIES

MAY 6 1983

Mr. T. J. Kucherawy
Titanium Metals Corporation of America
100 Titanium Way
P. O. Box 309
Toronto, Ohio 43964

RE: Permit Application Withdrawal Letter
(Insufficient Information)
FACILITY NAME: Titanium Metals Corporation of America
U.S. EPA ID NO.: OHT 400 011 946

Dear Mr. Kucherawy:

This is to acknowledge receipt of your letter of November 29, 1982, requesting the withdrawal of your Part A Hazardous Waste Permit Application. Your request did not contain sufficient information to enable this office to concur with your determination. Your request must contain a detailed explanation why the application should be withdrawn. Also, if at any time, since November 19, 1980, your operation included treatment, storage, or disposal of hazardous waste subject to 40 CFR 265, a closure plan must be filed with the withdrawal request. Requirements for closure are found in 40 CFR Part 265, Subpart G (enclosed).

If no response is received in this office within 30 days, we will assume your facility requires a permit. Accordingly, we will continue to process your application.

Please do not hesitate to contact the Technical, Permits and Compliance Section at (312) 353-2197 for assistance, if you have any questions. Please refer to "Permit Application Withdrawal Letter, (Insufficient Information)," in all telephone contacts and correspondence on this matter.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Enclosure

cc: Donald A. Wruck, Vice President, Operations
Paul R. Carapellotti, Secretary-Treasurer



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V

111 West Jackson Blvd.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:

RCRA ACTIVITIES

MAY 5 1982

Ms. D.R. Stauver
Titanium Metals Corp. of America
P.O. Box 309
Toronto, Ohio 43964

RE: Interim Status Acknowledgement USEPA ID No. OHD098435134
FACILITY NAME: Titanium Metals Corp. of America

Dear Ms. Stauver:

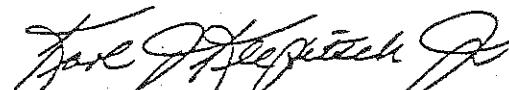
This is to acknowledge that the U.S. Environmental Protection Agency (USEPA) has completed processing your Part A Hazardous Waste Permit Application. It is the opinion of this office that the information submitted is complete and that you, as an owner or operator of a hazardous waste management facility, have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. However, should USEPA obtain information which indicates that your application was incomplete or inaccurate, you may be requested to provide further documentation of your claim for Interim Status. Our opinion will be reevaluated on the basis of this information.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265, or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The printout enclosed with this letter identifies the limit(s) of the process design capacities your facility may use during the interim status period. This information was obtained from your Part A Permit application. If you wish to handle new wastes, to change processes, to increase the design capacity of existing processes, or to change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

As stated in the first paragraph of this letter, you have met the requirements of 40 CFR Part 122.23; your facility may operate under interim status until such time as a permit is issued or denied. This will be preceded by a request from this office or the State (if authorized) for Part B of your application. Please contact Arthur Kawatachi of my staff at (312) 886-7449, if you have any questions concerning this letter or the enclosure.

Sincerely yours,


Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Enclosure

cc: J.D. Page
J. Byrne

Handwritten: 5/3/82
Handwritten: DJB 5/4/82

FACILITY NAME

TITANIUM METALS CORP TIMET DIV

EPA ID NUMBER

OHD098435134

FACILITY OPERATOR

TITANIUM METALS CORP TIMET DIV

FACILITY OWNER

TITANIUM METALS CORP *of America*

FACILITY LOCATION

100 TITANIUM WAY
TORONTO

OH 43964

PROCESS CODE

S01

DESIGN CAPACITY

7700.00000

UNIT OF MEASURE

G

*****KEY*****

PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE	* * UNIT OF * MEASURE	CODE
STORAGE:			* GALLONS	G
			* LITERS	L
CONTAINER	S01	G OR L	* CUBIC YARDS	Y
TANK	S02	G OR L	* CUBIC METERS	C
WASTE PILE	S03	Y OR C	* GALLONS PER DAY	U
SURFACE IMPOUNDMENT	S04	G OR L	* LITERS PER DAY	V
DISPOSAL:			* TONS PER HOUR	D
			* METRIC TONS\HOUR	W
INJECTION WELL	D79	G, L, U, OR V	* GALLONS\HOUR	E
LANDFILL	D80	A OR F	* LITERS\HOUR	H
LAND APPLICATION	D81	B OR Q	* ACRE-FEET	A
OCEAN DISPOSAL	D82	U OR V	* HECTARE-METER	F
SURFACE IMPOUNDMENT	D83	G OR L	* ACRES	B
TREATMENT:			* HECTARES	Q
			* POUNDS\HOUR	J
TANK	T01	U OR V	* KILOGRAMS\HOUR	R
SURFACE IMPOUNDMENT	T02	U OR V	* TONS PER DAY	N
INCINERATOR	T03	D, W, E, OR H	* METRIC TONS\DAY	S
OTHER	T04	J, R, N, S, U, V	*	

U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA I.D. NO.

ADD TSD 9-22-81

NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS

III. LOCATION OF INSTALLATION

PLEASE PLACE LABEL IN THIS SPACE

000050 JUL 25 80

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

FOR OFFICIAL USE ONLY

COMMENTS

INSTALLATION'S EPA I.D. NUMBER

APPROVED

DATE RECEIVED
(yr., mo., & day)

F 0ND098435134

T/A C

A

800725

I. NAME OF INSTALLATION

Titanium Metals Corporation of America

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX

3 PO Box 309

CITY OR TOWN

Toronto

ST.

ZIP CODE

OH43964

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER

5 100 Titanium Way

CITY OR TOWN

6 Toronto

ST.

ZIP CODE

OH43964

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)

PHONE NO. (area code & no.)

2 Stauver D R Environmental Eng

614-537-1571

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER

8 ALLEGHENY LUDLUM INDUSTRIES

B. TYPE OF OWNERSHIP
(enter the appropriate letter into box)F = FEDERAL
M = NON-FEDERAL

M

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

☒ A. GENERATION☐ B. TRANSPORTATION (complete item VII)☐ C. TREAT/STORE/DISPOSE☐ D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))

☐ A. AIR☐ B. RAIL☐ C. HIGHWAY☐ D. WATER☐ E. OTHER (specify):

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

☒ A. FIRST NOTIFICATION☐ B. SUBSEQUENT NOTIFICATION (complete item C)

C. INSTALLATION'S EPA I.D. NO.

0ND098435134

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1 FOO1 23 - 26	2 23 - 26	3 23 - 26	4 23 - 26	5 23 - 26	6 23 - 26
7 23 - 26	8 23 - 26	9 23 - 26	10 23 - 26	11 23 - 26	12 23 - 26

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13 23 - 26	14 23 - 26	15 23 - 26	16 23 - 26	17 23 - 26	18 23 - 26
19 23 - 26	20 23 - 26	21 23 - 26	22 23 - 26	23 23 - 26	24 23 - 26
25 23 - 26	26 23 - 26	27 23 - 26	28 23 - 26	29 23 - 26	30 23 - 26

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31 23 - 26	32 23 - 26	33 23 - 26	34 23 - 26	35 23 - 26	36 23 - 26
37 23 - 26	38 23 - 26	39 23 - 26	40 23 - 26	41 23 - 26	42 23 - 26
43 23 - 26	44 23 - 26	45 23 - 26	46 23 - 26	47 23 - 26	48 23 - 26

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49 23 - 26	50 23 - 26	51 23 - 26	52 23 - 26	53 23 - 26	54 23 - 26
---------------	---------------	---------------	---------------	---------------	---------------

E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☒ 1. IGNITABLE
(D001)

☒ 2. CORROSIVE
(D002)

☐ 3. REACTIVE
(D003)

☐ 4. TOXIC
(D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE

James D. Page

NAME & OFFICIAL TITLE (type or print)

J. D. Page
PLANT MANAGER

DATE SIGNED

7-23-80

U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

PLEASE PLACE LABEL IN THIS SPACE

FOR OFFICIAL USE ONLY

COMMENTS

INSTALLATION'S EPA I.D. NUMBER

APPROVED

DATE RECEIVED
(yr., mo., & day)

F OHT400011946

T/A C
21

A

800725

I. NAME OF INSTALLATION

Titanium Metals Corporation of America

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX

3 PO Box 309

CITY OR TOWN

Toronto

ST.

ZIP CODE

OH43964

III. LOCATION OF INSTALLATION

CREEK

STREET OR ROUTE NUMBER

5 Island Township Jefferson County 100 Titanium Way

CITY OR TOWN

6 Toronto

ST.

ZIP CODE

OH43964

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)

PHONE NO. (area code & no.)

2 Stauver D R Environmental Eng

614-537-1571

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER

8 ALLEGHENY LUDLUM INDUSTRIES

B. TYPE OF OWNERSHIP
(enter the appropriate letter into box)F = FEDERAL
M = NON-FEDERAL

M

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

☐ A. GENERATION☒ B. TRANSPORTATION (complete item VII)☒ C. TREAT/STORE/DISPOSE☐ D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))

☐ A. AIR☐ B. RAIL☒ C. HIGHWAY☐ D. WATER☐ E. OTHER (specify):

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

☒ A. FIRST NOTIFICATION☐ B. SUBSEQUENT NOTIFICATION (complete item C)

C. INSTALLATION'S EPA I.D. NO.

OHT400011946

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

JUL 25 1980

OHT 40011946

I.D. - FOR OFFICIAL USE ONLY

S	W	0	1	2	3	4	5	6	7	8	9	T/A	C
1	2	3	4	5	6	7	8	9	10	11	12	13	14

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
7	8	9	10	11	12
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
19	20	21	22	23	24
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
25	26	27	28	29	30
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
37	38	39	40	41	42
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
43	44	45	46	47	48
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☒ 1. IGNITABLE
(D001)

☐ 2. CORROSIVE
(D002)

☐ 3. REACTIVE
(D003)

☐ 4. TOXIC
(D000)

X. CERTIFICATION

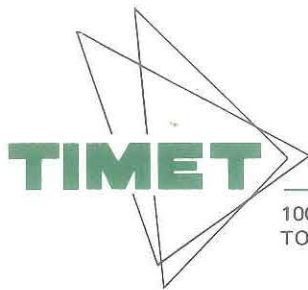
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE <i>James D. Page</i>	NAME & OFFICIAL TITLE (type or print) J. D. Page PLANT MANAGER	DATE SIGNED 7-23-80
-----------------------------------	--	------------------------

EPA Form 8700-12 (6-80) REVERSE



JUL 25 1980



100 TITANIUM WAY, P.O. BOX 309
TORONTO, OHIO • (614) 537-1571

February 12, 1986

R.E.C.R.A. Activities
Region V
P. O. Box A 3587
Chicago, Illinois 60690

Attn: ATKJG

Dear Sir or Madam:

In regards to your requests dated January 31, 1986, concerning Hazardous Waste releases and corrective actions.

In regards to U.S. E.P.A. ID #OHT00D11946, we have no record of this number in our files and do not use it at this facility.

In regards to U.S. E.P.A. ID #OHD098435134, we feel that this request does not apply to this plant. TIMET formally requested to be removed from this Hazardous Waste Storage Site Permit list in January of 1983. In a letter from the Ohio H.W.F.A.B. dated January 9, 1984, we received acknowledgement that our permit had been withdrawn. (copy attached) In a letter dated September 27, 1984, from the U.S. E.P.A. Region 5 we received acknowledgement of our change in status from that of a storage facility under federal rules to that of our then and current status under RCRA of a generator storing less than 90 days. (copy attached)

If you require any further information or have any questions concerning this matter, please contact me at (614) 537-1571.

Sincerely,

E. L. Offord

E. L. Offord

ELO/rw

Attachments

c - File: 10.2.00 (w/att)



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

SEP 27 1984

REPLY TO ATTENTION OF:

5HW-13

J.D. Page - Vice President - Mill Operation
Titanium Metals Corporation - Timet Corps.
100 Titanium Way
Toronto, Ohio 43964

RE: Withdrawal of Part A
FACILITY NAME: Titanium Metals Corporation
U.S. EPA ID #: OHD 098-435-134

Dear Mr. Page

This Agency has been advised by the Ohio Environmental Protection Agency (Ohio EPA) that the referenced facility is no longer operating as a storage facility under Federal rules. The facility's current status under the Resource Conservation and Recovery Act (RCRA) is that of a generator storing less than 90 days. This letter acknowledges your change in status.

Should you decide in the future to initiate storage of hazardous wastes for greater than 90 days, and such storage is consistent with the original Part A application, you must resubmit a Part A application within 30 days of such initiation.

Should you propose to initiate storage of hazardous wastes in a manner inconsistent with the original Part A application, or to initiate the treatment or disposal of hazardous wastes, you must contact our office and the Ohio EPA at least ten days prior to such initiation. Based on the specifics of the proposed changes, we will advise you whether actual issuance of a permit is a prerequisite for such changes, or whether submittal of Part A and B of your application is sufficient. Failure to resubmit a Part A application, or to contact our office as mentioned above, would subject you to enforcement action. RCRA provides for civil penalties up to \$25,000 per violation.

If you have questions, please contact Rebecca Strom of my staff, at (312) 886-6194, for assistance.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "William H. Miner, Jr.", written over the typed name.

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

cc: Tom Carlisle, Ohio EPA
Cheryl Kaiser, Ohio EPA
Environmental Engineer

T. J. Kucherway
Deborah R. Stauver,
Environmental Engineer

hazardous • waste • facility • approval • board

Richard F. Celeste, Governor
Robert H. Maynard, Chairman

hwfab

P.O. Box 1049
361 E. Broad St.
Columbus, Ohio 43216
(614) 462-6981

January 9, 1984

Mr. T.J. Kucherawy
TIMET
100 Titanium Way, P.O. Box 309
Toronto, Ohio 43964

Dear Mr. Kucherawy:

This correspondence acknowledges our receipt of the Board certified copy of the hazardous waste permit originally issued to your facility.

The permit (#04-41-0565) is considered to be withdrawn at your request and therefore is no longer valid.

If you have any questions concerning your permit, please do not hesitate to contact me.

Sincerely,



Philbin L. Scott
Technical Advisor

PLS/dmc

cc: Tom Crepeau, Ohio EPA DHMM
Facility File



TIMET

100 TITANIUM WAY, P.O. BOX 309
TORONTO, OHIO • (614) 537-1571

June 14, 1984

RCRA
230 S. Dearborn
13th Floor
Chicago, Illinois 60604

Attn: Maric Oliver

Dear Ms. Oliver:

This letter is to clarify some of the questions you had during our phone conversation on June 12, 1984.

The correct address for Timet is 100 Titanium Way, Toronto, Ohio 43964; the EPA identification number corresponding to that address is #OHD098435134. This is the only ID number for the plant of which I am aware. The OHT number in your files may have been a temporary number for the plant at one time, but there are not two Timet plants in the State of Ohio.

The Toronto Plant is a hazardous waste generator only. Hazardous material is hauled from the plant by outside contractors.

Concerning ownership and plant contacts, please note that Timet is owned by Allegheny International and National Lead and that I am the EPA contact at the present time.

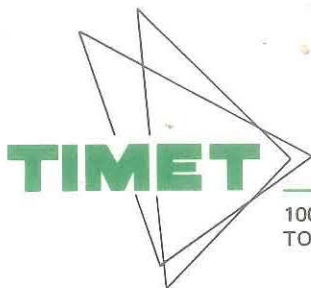
If you have any questions please call me at 614-537-1571.

Sincerely,


T. J. Kucherauw

TJK/1a
cc: OEPA
Box 1049
Columbus, Ohio 43216
Attn: Tom Crepeau

RECEIVED
JUN 18 1984
WASTE MANAGEMENT
BRANCH



17
DIT

100 TITANIUM WAY, P.O. BOX 309
TORONTO, OHIO • (614) 537-1571

June 7, 1983

RCRA Activities
U.S.E.P.A. Region V
P.O. Box A 3587
Chicago, Illinois 60690-3587

Attn: Jim Mayka

Dear Sir:

With the submittal of the attached "Request for Change in Status" form, it is anticipated that the Toronto, Ohio plant of Timet will be considered as only a Generator of Hazardous Wastes.

Per our phone conversation on June 3, 1983, official notice will be made public in six to eight weeks; however, the Toronto Plant should conduct operations as a Generator in the interim.

If there are any further questions or requirements concerning this matter please contact me at 614-537-1571. Thank you for your full cooperation and assistance in this matter.

Sincerely,


T. J. Kuchera

TJK/la

cc: C. Busby
H. Cotton
J. Page
F. Steinberg

RECEIVED

OHT 400 BU 946 PA,
TR S, TSD JUN 13 1983

WASTE MANAGEMENT BRANCH
EPA, REGION V

RECEIVED
6/13/83

REQUEST FOR CHANGE IN STATUS TO:

"GENERATOR ACCUMULATING WASTE ON-SITE IN COMPLIANCE WITH 40 CFR 262.34"

(APPLICABLE TO FACILITIES WHICH, AS OF NOVEMBER 19, 1980, HAVE BEEN
STORING WASTES IN CONTAINERS AND/OR TANKS ONLY)

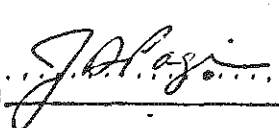
Facility Name:	TIMET
Facility Location:	TORONTO, OHIO
Mailing Address:	100 Titanium Way Toronto, Ohio 43964
U.S. EPA ID No.:	OHT 400 011 946

1. I certify, in reference to the above-named facility, that a complete and accurate description of the activities currently conducted, for purposes of the Resource Conservation and Recovery Act (RCRA), are those of a generator accumulating waste on-site in compliance with 40 CFR 262.34. This description of activities shall be considered effective as of

6-1-83

(please type in above: today's date, or other appropriate past date)

2. I certify that all hazardous wastes which had been stored at this facility for greater than 90 days have been permanently removed and -- for that portion of the wastes that were present on-site on or after November 19, 1980 -- the manifest requirements of 40 CFR Part 262 have been complied with, and all manifests are on file at this facility, available for inspection by authorized State and Federal officials.
3. I finally certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

	Vice President	6-1-83
---	----------------	--------

Signature

Typed Name and Title

Date

J. D. Page -Vice President - Mill Operations 6/1/83

(Please have appropriate official, per 40 CFR 122.6, sign and date)

TIMET

100 TITANIUM WAY, P.O. BOX 309
TORONTO, OHIO • (614) 537-1571

TITANIUM METALS CORPORATION OF
AMERICA

November 29, 1982

OHT 400 011 946

T, T2D, PA

USEPA
Region V
230 South Dearborn Street
Chicago, Illinois 60604

Attention: RCRA Activities

Dear Sirs:

This letter is in response to a notification received by TIMET on 9/30/82, concerning hazardous waste activity.

After reviewing the implications involved in being a hazardous waste storage site and the processes in the plant, it has been decided that TIMET should not be a storage site.

Arrangements have been made to correctly remove and dispose of the hazardous waste materials generated at the Toronto Plant within the allotted time periods.

Please remove TIMET from the list of storage sites; the ID reference number is OHT400011946.

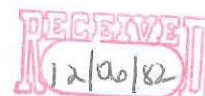
If there are any questions, or more information necessary contact me at 614-537-1571 Ext. 322.

Sincerely,

T. J. Kucherauw / mo

T. J. Kucherauw

TJK/rw



NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

A. NAME OF INSTALLATION'S LEGAL OWNER

5/8 National Lead Industries



TIMET

100 TITANIUM WAY, P.O. BOX 309
TORONTO, OHIO • (614) 537-1571

July 6, 1982

Regional Administrator
U. S. Environmental Protection Agency
Box A3587
Chicago, Illinois 60690-3587


Attention: RCRA Financial Requirements

Gentlemen:

Enclosed is the EPA Hazardous Waste Financial Requirements
for TIMET Division Titanium Metals Corporation of America.
The Toronto, Ohio plant is included in this bond.

If there are any questions concerning this, please contact
me.

Sincerely,


D. R. Stauver
Environmental Engineer

DRS/rw

Enclosure



TIMET

100 TITANIUM WAY, P.O. BOX 309
TORONTO, OHIO • (614) 537-1571

Inspection file
K. Homer
10/6/81

September 30, 1981

Mr. Paul Flanigan, P.E.
Hazardous Materials Management
State of Ohio Environmental Protection Agency
Box 1049
361 E. Broad St.
Columbus, Ohio 43216

Dear Mr. Flanigan:

Your letter of September 25th, listed TIMET's deficiencies for RCRA Interim Status, that were found in our April 22, inspection by Pat Gorman.

Since that inspection, we have completed all the items that were listed: Generator Requirements, General Facility Standards, Preparedness and Prevention, Contingency and Emergency, Closure for Non-Disposal Facilities, and Management of Containers.

TIMET intends to comply with all the applicable regulations contained in 40 CFR 265. If you have any questions concerning our interim status, please contact me.

Sincerely,

Deborah R. Stauver

Deborah R. Stauver
Environmental Engineer

DRS/rw

cc - *✓* Kathlenn Homer, U.S. EPA
Pat Gorman, SEDO



100 TITANIUM WAY, P.O. BOX 309
TORONTO, OHIO • (614) 537-1571

September 15, 1981

RECEIVED

SEP 22 1981

WASTE MANAGEMENT BRANCH
EPA, REGION V

Ms. Kathy Homer
U.S. Environmental Protection Agency
230 South Dearborn Street
Chicago, Illinois 60604

Dear Ms. Homer:

Ms. Brenda Lillstrom asked me to send in a revised Form 3, Hazardous Waste Permit Application. On our previous Form 3, Item VIII, Facility Owner, I had marked down National Lead Industries and Allegheny International.

Actually, this facility (the plant) is owned by Titanium Metals Corporation of America. This facility is the TIMET Division. Titanium Metals Corporation of America is owned by National Lead and Allegheny International.

The enclosed Form 3 shows Titanium Metals as the facility owners. Also, I have the proper signatures.

Also, enclosed is a copy of Form 1, General Information, that was corrected for the Ohio EPA Hazardous Waste Task Force.

If you require any other information, please contact me.

Sincerely,

Deborah R. Stauver
Environmental Engineer

DRS/rw

Enclosures

FORM 1
GENERAL

U.S. ENVIRONMENTAL PROTECTION AGENCY
GENERAL INFORMATION
Consolidated Permits Program
(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER
F 04 D 098435134

II. POLLUTANT CHARACTERISTICS

PA I.D. NUMBER
III. FACILITY NAME
V. FACILITY MAILING ADDRESS
VI. FACILITY LOCATION

PLEASE PLACE LABEL IN THIS SPACE

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete Items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK "X"			SPECIFIC QUESTIONS	MARK "X"		
	YES	NO	FORM ATTACHED		YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)	X			D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X			F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY
1 SKIP TITANIUM METALS CORP TIMET DIVISION

IV. FACILITY CONTACT
A. NAME & TITLE (last, first, & title)
2 STAUVER D R ENVIRONMENTAL ENG
B. PHONE (area code & no.)
614 537 1571

V. FACILITY MAILING ADDRESS
A. STREET OR P.O. BOX
3 100 TITANIUM WAY PO BOX 309
B. CITY OR TOWN
4 TORONTO
C. STATE
OH
D. ZIP CODE
43964

VI. FACILITY LOCATION
A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER
5 100 TITANIUM WAY
B. COUNTY NAME
JEFFERSON
C. CITY OR TOWN
6 TORONTO
D. STATE
OH
E. ZIP CODE
43964
F. COUNTY CODE (if known)

VII. SIC CODES (4-digit, in order of priority)

A. FIRST										B. SECOND									
7	3	3	5	6	(specify)	7				(specify)									
C. THIRD										D. FOURTH									
7					(specify)	7				(specify)									

VIII. OPERATOR INFORMATION

A. NAME																														B. Is the name listed in Item VIII-A also the owner?									
TITANIUM METALS CORP TIMET DIV																														<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO									
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)																														D. PHONE (area code & no.)									
F = FEDERAL S = STATE P = PRIVATE										M = PUBLIC (other than federal or state) O = OTHER (specify)										P (specify)										A 614 537 1571									
E. STREET OR P.O. BOX																																							
100 TITANIUM WAY PO BOX 309																																							
F. CITY OR TOWN																				G. STATE					H. ZIP CODE					IX. INDIAN LAND									
TORONTO																				OH					43964					Is the facility located on Indian lands? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO									

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)															D. PSD (Air Emissions from Proposed Sources)														
9 N DEPA ED10*AD															9 P														
B. UIC (Underground Injection of Fluids)															E. OTHER (specify)														
9 U															(specify)														
C. RCRA (Hazardous Wastes)															E. OTHER (specify)														
9 R															(specify)														

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS (provide a brief description)

Products Made : Titanium Mill Products - Billet, Bar, Strip
Tubing, Sheet, and Plate

Raw Materials : Titanium Ingot

Processes Used : Forging, Pickling, Rolling, Grinding, Blasting,
Tube welding, Heat treating, Forming,
Annealing, Shearing, Slitting, Finishing

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)															B. SIGNATURE															C. DATE SIGNED									
James D. Page Vice-President Manufacturing															James D. Page															8/28/81									
COMMENTS FOR OFFICIAL USE ONLY																																							

FORM 3 RCRA		U.S. ENVIRONMENTAL PROTECTION AGENCY HAZARDOUS WASTE PERMIT APPLICATION Consolidated Permits Program (This information is required under Section 3005 of RCRA.)	I. EPA I.D. NUMBER											
			F 0 H D 0 9 8 4 3 5 1 3 4											

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS
23	24	29

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION (place an "X" below and provide the appropriate date)

☒ 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)

☐ 2. NEW FACILITY (Complete item below.)

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)

FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

B. REVISED APPLICATION (place an "X" below and complete Item I above)

☒ 1. FACILITY HAS INTERIM STATUS

☐ 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES - CODES AND DESIGN CAPACITIES

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.

1. AMOUNT - Enter the amount.

2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:			Treatment:		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS	TANK	T01	GALLONS PER DAY OR LITERS PER DAY
TANK	S02	GALLONS OR LITERS		T02	GALLONS PER DAY OR LITERS PER DAY
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS	SURFACE IMPOUNDMENT	T03	TONS PER HOUR OR METRIC TONS PER HOUR
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS	INCINERATOR	T04	GALLONS PER HOUR OR LITERS PER HOUR
Disposal:			OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)		
INJECTION WELL	D79	GALLONS OR LITERS			
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER			
LAND APPLICATION	D81	ACRES OR HECTARES			
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY			
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS			
UNIT OF MEASURE	CODE	UNIT OF MEASURE	UNIT OF MEASURE	CODE	UNIT OF MEASURE
GALLONS	G	LITERS PER DAY	V	ACRE-FEET	A
LITERS	L	TONS PER HOUR	D	HECTARE-METER	F
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	B
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	Q
GALLONS PER DAY	U	LITERS PER HOUR	H		

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

C										DUP										I									
X-1										X-2										1									
S 0 2										T 0 3										S 0 1									
600										20										7700									
G										E										G									
5										6										7									
8										9										10									

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE, INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. **EPA HAZARDOUS WASTE NUMBER** — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. **ESTIMATED ANNUAL QUANTITY** — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. **UNIT OF MEASURE** — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE
POUNDS.....	P
TONS.....	T

METRIC UNIT OF MEASURE	CODE
KILOGRAMS.....	K
METRIC TONS.....	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES**1. PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARDOUS WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

Continued from page 2.

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY													
<div> <div>W</div> <div>04D098435134</div> <div>1</div> </div>													<div> <div>W</div> <div>DUP</div> <div>2</div> <div>DUP</div> </div>													
DESCRIPTION OF HAZARDOUS WASTES (continued)																										
WASTE NO.	A. EPA HAZARD. WASTE NO. (enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE				C. UNIT OF MEASURE (enter code)		D. PROCESSES															
											1. PROCESS CODES (enter)								2. PROCESS DESCRIPTION (if a code is not entered in D(1))							
	23	24	25	26	27	28	29	30	31	32	27	28	29	27	28	29	27	28	29	27	28	29				
1	F	0	0	1	35,200				P		S	0	1													
2	D	0	0	2	80,000				P		S	0	1													
3																										
4																										
5																										
6																										
7																										
8																										
9																										
10																										
11																										
12																										
13																										
14																										
15																										
16																										
17																										
18																										
19																										
20																										
21																										
22																										
23																										
24																										
25																										
26																										

IV. DESCRIPTION OF HAZARDOUS WASTE 3 (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)

S	F	O	H	D	0	9	8	4	3	5	1	3	4	T/A	C
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

LONGITUDE (degrees, minutes, & seconds)

40 26 45

80 37 15

VIII. FACILITY OWNER

☐ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & no.)

N L Industries

609-448-3200

3. STREET OR P.O. BOX

4. CITY OR TOWN

5. ST.

6. ZIP CODE

P.O. Box 420

Hightstown

NJ

08520

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

B. SIGNATURE

C. DATE SIGNED

J.D. PAGE - VP MFG

JDP

6/8/81

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

B. SIGNATURE

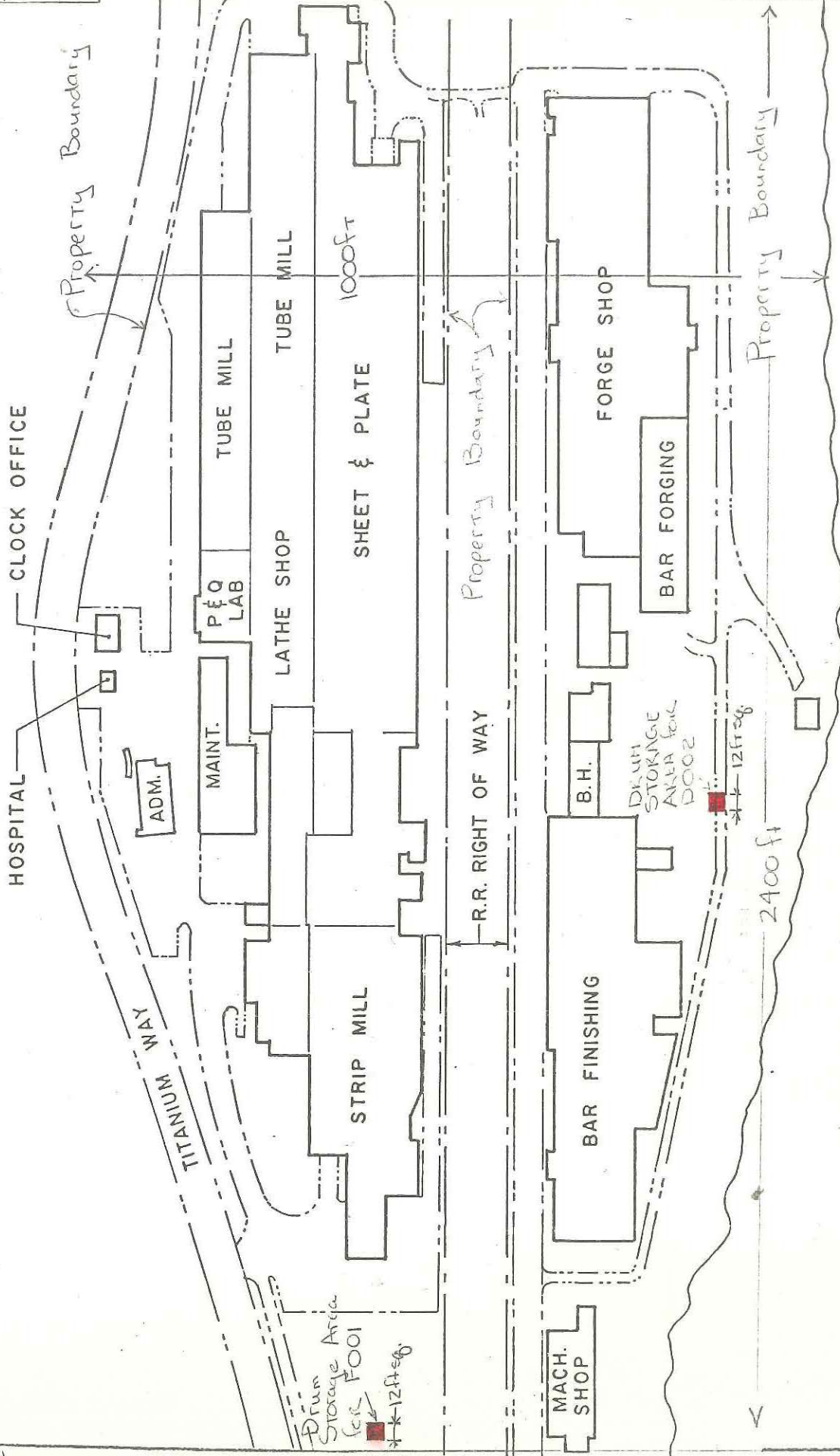
C. DATE SIGNED

J.D. Page - Plant Manager

JDP

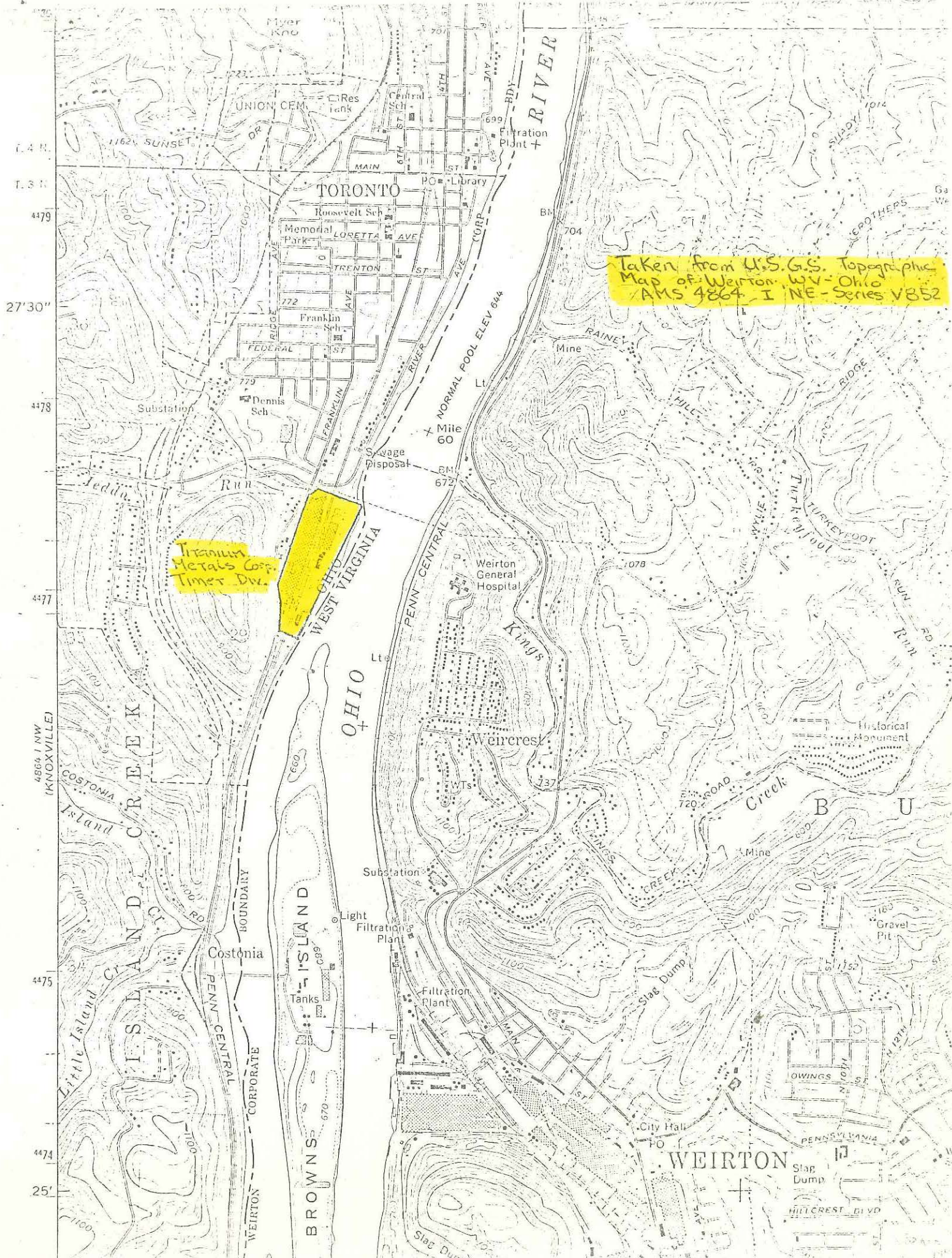
6/8/81

V. FACILITY DRAWING



OHIO RIVER

APPROX. SCALE: 1" = 240ft HORIZONTAL
1" = 160ft VERTICAL



Taken from U.S.G.S. Topographic Map of Weirton, WV-Ohio AMS 4864 I NE-Series V852

Titanium Metals Corp. Times Div.

WEIRTON

FORM 1 GENERAL	 ENVIRONMENTAL PROTECTION AGENCY GENERAL INFORMATION Consolidated Permits Program <i>(Read the "General Instructions" before starting.)</i>	I. EPA I.D. NUMBER <div style="border: 1px solid black; padding: 2px;"> OH D098435134 </div>
II. POLLUTANT CHARACTERISTICS INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.	PLEASE PLACE LABEL IN THIS SPACE <div style="font-size: 1.5em; color: blue;">OHT 400 ON 946</div>	

SPECIFIC QUESTIONS	YES	NO	FORM ATTACHED	SPECIFIC QUESTIONS	YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)		X		D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X			F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY	1 SKIP TITANIUM METALS CORP OF AMERICA
------------------------------	--

IV. FACILITY CONTACT	A. NAME & TITLE (last, first, & title) 2 STAUVER DEBORAH ENVIR ENGINEER
	B. PHONE (area code & no.) 614 537 1571

V. FACILITY MAILING ADDRESS	A. STREET OR P.O. BOX 3 100 TITANIUM WAY PO BOX 309
	B. CITY OR TOWN 4 TORONTO
	C. STATE OH
	D. ZIP CODE 43964

VI. FACILITY LOCATION	A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER 5 ISLAND CREEK TOWNSHIP
	B. COUNTY NAME JEFFERSON COUNTY
	C. CITY OR TOWN 6 TORONTO
	D. STATE OH
	E. ZIP CODE 43964
	F. COUNTY CODE (if known) 081

NOV 12 1990

VII. SIC CODES (4-digit, in order of priority)

A. FIRST										B. SECOND									
7 3356 (specify) Forging, Rolling, Pickling of Titanium										7 (specify)									
C. THIRD										D. FOURTH									
7 (specify)										7 (specify)									

VIII. OPERATOR INFORMATION

A. NAME																														B. Is the name listed in Item VIII-A also the owner?									
8 TITANIUM METALS CORP OF AMERICA																														<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO									
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)																														D. PHONE (area code & no.)									
F = FEDERAL S = STATE P = PRIVATE										M = PUBLIC (other than federal or state) O = OTHER (specify)										P (specify)										614 537 1571									
E. STREET OR P.O. BOX																																							
100 TITANIUM WAY P.O. BOX 309																																							
F. CITY OR TOWN																				G. STATE					H. ZIP CODE					IX. INDIAN LAND									
B TORONTO																				OH					43964					Is the facility located on Indian lands? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO									

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water) (Ohio)															D. PSD (Air Emissions from Proposed Sources)															Addition made per Feb. 26, '81 letter request. B. Lilestrom 8/18/81									
9 N E010*AD															9 P																								
B. UIC (Underground Injection of Fluids)															E. OTHER (specify)															Forest Fire Wardens Permit to kindle fire									
9 U															9 ONAT RES 242 (specify)																								
C. RCRA (Hazardous Wastes)															E. OTHER (specify)															(specify)									
9 R															9																								

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS (provide a brief description)

Products Made: Titanium MILL Products - Billet, Bar, Strip, Tubing, Sheet and Plate
Raw Materials: Titanium Ingot
Processes Used: Forging, Pickling, Rolling, Grinding, Blasting, Tube welding, Heat treating, Forming, Annealing, Shearing, Slitting, Finishing
F9: A/51

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print) Donald A. Wruck Vice-President Operations										B. SIGNATURE Donald A. Wruck										C. DATE SIGNED Nov 10, 1980									
--	--	--	--	--	--	--	--	--	--	---------------------------------	--	--	--	--	--	--	--	--	--	--------------------------------	--	--	--	--	--	--	--	--	--

COMMENTS FOR OFFICIAL USE ONLY

--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--

385

FORM 3 RCRA		U.S. ENVIRONMENTAL PROTECTION AGENCY HAZARDOUS WASTE PERMIT APPLICATION Consolidated Permits Program (This information is required under Section 3005 of RCRA.)	I. EPA I.D. NUMBER									
			F 0 H D 0 9 8 4 3 5 1 3 4 3 1									

FOR OFFICIAL USE ONLY									
APPLICATION APPROVED		DATE RECEIVED (yr., mo., & day)		COMMENTS					
23		24							

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION (place an "X" below and provide the appropriate date)									
<input checked="" type="checkbox"/> 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)									
<input type="checkbox"/> 2. NEW FACILITY (Complete item below.)									
FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)									
C	YR.	MO.	DAY						
8	74	5	28						
15	73	74	75	76	77	78			

B. REVISED APPLICATION (place an "X" below and complete Item I above)									
<input type="checkbox"/> 1. FACILITY HAS INTERIM STATUS									
<input type="checkbox"/> 2. FACILITY HAS A RCRA PERMIT									

III. PROCESSES - CODES AND DESIGN CAPACITIES

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.

1. AMOUNT - Enter the amount.

2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PRO-CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PRO-CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:			Treatment:		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS	TANK	T01	GALLONS PER DAY OR LITERS PER DAY
TANK	S02	GALLONS OR LITERS	SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS	INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS	OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)	T04	GALLONS PER DAY OR LITERS PER DAY
Disposal:					
INJECTION WELL	D79	GALLONS OR LITERS			
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER			
LAND APPLICATION	D81	ACRES OR HECTARES			
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY			
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS			
UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS.....	G	LITERS PER DAY.....	V	ACRE-FEET.....	A
LITERS.....	L	TONS PER HOUR.....	D	HECTARE-METER.....	F
CUBIC YARDS.....	Y	METRIC TONS PER HOUR.....	W	ACRES.....	B
CUBIC METERS.....	C	GALLONS PER HOUR.....	E	HECTARES.....	Q
GALLONS PER DAY.....	U	LITERS PER HOUR.....	H		

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

S C DUP T/A C 3 1									
1 2 13 14 15 27 28 29 30 31 32									
LINE NUMBER	A. PRO-CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY	LINE NUMBER	A. PRO-CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY
		1. AMOUNT (specify)	2. UNIT OF MEASURE (enter code)				1. AMOUNT	2. UNIT OF MEASURE (enter code)	
X-1	S 0 2	600	G		5				
X-2	T 0 3	999 999 999	E		6				
1	D 8 0	1,548,800	Y		7				
					8				
					9				
3									
4					10				
16 17 18 19 27 28 29 30 31 32									

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

Process Code
T04

Titanium Metal Fines mixed with 12% tripotassium phosphate in water from a wet grinding operation is open burned on Strip Mining grounds. After burning it is no longer a Hazardous Waste, no longer ignitable.

Design Capacity 464,000 Y

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE CODE
POUNDS P
TONS T

METRIC UNIT OF MEASURE CODE
KILOGRAMS K
METRIC TONS M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES**1. PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

W Z Z	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEA- SURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

EPA I.D. NUMBER (enter from page 1)															FOR OFFICIAL USE ONLY												
<div> <div>W</div> <div>0</div> <div>H</div> <div>D</div> <div>0</div> <div>9</div> <div>8</div> <div>4</div> <div>3</div> <div>5</div> <div>1</div> <div>3</div> <div>4</div> <div>3</div> <div>1</div> </div>															<div> <div>W</div> <div>DUP</div> <div>3</div> <div>2</div> <div>DUP</div> </div>												
DESCRIPTION OF HAZARDOUS WASTES (continued)																											
LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES																							
				1. PROCESS CODES (enter)								2. PROCESS DESCRIPTION (if a code is not entered in D(1))															
23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50
1	0001	675,000 000	P	T04D80																							
2																											
3																											
4																											
5																											
6																											
7																											
8																											
9																											
10																											
11																											
12																											
13																											
14																											
15																											
16																											
17																											
18																											
19																											
20																											
21																											
22																											
23																											
24																											
25																											
26																											

IV. DESCRIPTION OF HAZARDOUS WASTE

(continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)

S	F	O	H	D	0	9	8	4	3	5	1	3	4	3	6
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures, existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

86 41 07

LONGITUDE (degrees, minutes, & seconds)

040 30 31

VIII. FACILITY OWNER

☐ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & no.)

C	E	Anthony Mining Company Inc.	614-282-5301
15	16	17	18

3. STREET OR P.O. BOX

4. CITY OR TOWN

5. ST.

6. ZIP CODE

C	F	PO Box 1298	C	G	Steubenville	OH	43952
19	20	21	22	23	24	25	26

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

Paul R. Carapellotti
Secretary - Treasurer

B. SIGNATURE

ANTHONY MINING CO INC
Anthony Mining Co Inc

C. DATE SIGNED

11-6-80

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

Donald A. Wruck
Vice-President, Operations

B. SIGNATURE

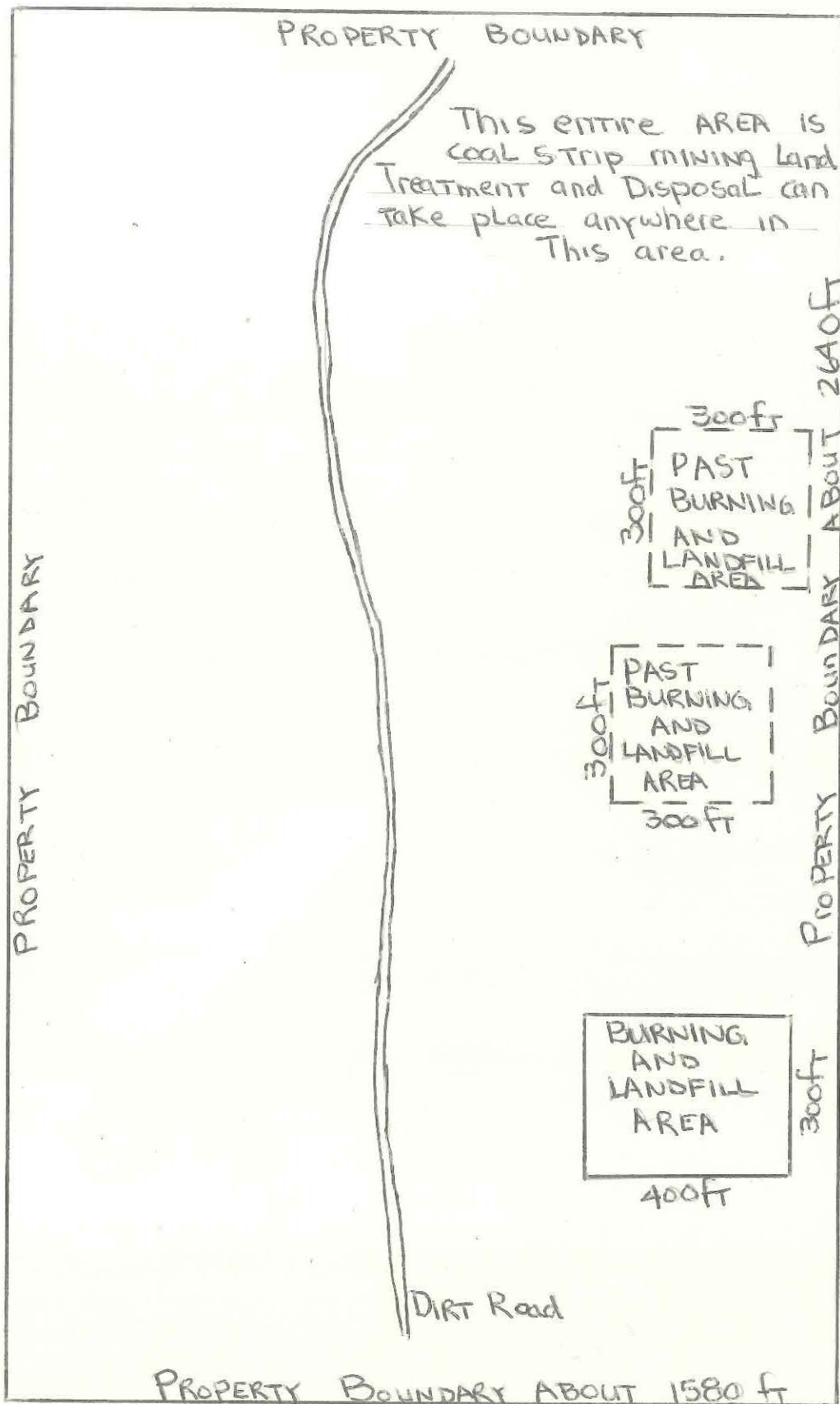
Donald A. Wruck

C. DATE SIGNED

Nov 10, 1980

385

FACILITY DRAWING (see page 4)



Scale: 1in=300ft



EXIST. TREAT & STORAGE AREA
11/6/80



EXIST. TREAT & STORAGE AREA
11/6/80



EXISTING TREATMENT AND STORAGE AREA
11/6/80

Please print or type in the unshaded areas only
(fill-in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-S80004

FORM 3 EPA HAZARDOUS WASTE PERMIT APPLICATION
Consolidated Permits Program
(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER
F 0 H D 0 9 8 4 3 5 1 3 4

FOR OFFICIAL USE ONLY

APPLICATION DATE RECEIVED (yr., mo., & day) COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION (place an "X" below and provide the appropriate date)

☒ 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)

☐ 2. NEW FACILITY (Complete item below.)

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)

FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

B. REVISED APPLICATION (place an "X" below and complete Item I above)

☒ 1. FACILITY HAS INTERIM STATUS

☐ 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES - CODES AND DESIGN CAPACITIES

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.

1. AMOUNT - Enter the amount.

2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:			Treatment:		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS	TANK	T01	GALLONS PER DAY OR LITERS PER DAY
TANK	S02	GALLONS OR LITERS	SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS	INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS			
Disposal:			OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)	T04	GALLONS PER DAY OR LITERS PER DAY
INJECTION WELL	D79	GALLONS OR LITERS			
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER			
LAND APPLICATION	D81	ACRES OR HECTARES			
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY			
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS			
UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	V	ACRE-FEET	A
LITERS	L	TONS PER HOUR	D	HECTARE-METER	F
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	B
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	Q
GALLONS PER DAY	U	LITERS PER HOUR	H		

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

Example completion of Item III showing process codes and design capacities for storage tanks and an incinerator.

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE
POUNDS.....	P
TONS.....	T

METRIC UNIT OF MEASURE	CODE
KILOGRAMS.....	K
METRIC TONS.....	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES**1. PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARDOUS WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY															
S W O H D 0 9 8 4 3 5 1 3 4 1 2 13 14 15													S W 1 2 13 14 15 23 24 25 26															
DESCRIPTION OF HAZARDOUS WASTES (continued)																												
WASTE NO.	A. EPA HAZARD. WASTE NO. (enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE				C. UNIT OF MEASURE (enter code)	D. PROCESSES																		
										1. PROCESS CODES (enter)																		
	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50
1	F	0	0	1	35,200					P	S	0	1															
2	D	0	0	2	80,000					P	S	0	1															
3																												
4																												
5																												
6																												
7																												
8																												
9																												
10																												
11																												
12																												
13																												
14																												
15																												
16																												
17																												
18																												
19																												
20																												
21																												
22																												
23																												
24																												
25																												
26																												

IV. DESCRIPTION OF HAZARDOUS WASTE (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)

S	F	O	H	D	O	9	8	4	3	5	1	3	4	T/A	C
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

4	0	2	6	4	5
65	66	67	68	69	71

LONGITUDE (degrees, minutes, & seconds)

8	0	3	7	1	5
72	73	74	75	76	79

VIII. FACILITY OWNER

☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & no.)

E	Titanium Metals Corporation of America	4	1	2	2	6	2	4	2	0	0
13	16	55	56	58	59	61	62	63	64	65	66

3. STREET OR P.O. BOX

4. CITY OR TOWN

5. ST.

6. ZIP CODE

C	P. O. Box 2824	G	Pittsburgh,	P	A	1	5	2	3	0
13	16	45	15	16	40	41	42	43	44	45

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

B. SIGNATURE

C. DATE SIGNED

J. Byrne, President of Titanium Metals Corporation of America

9/14/81

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

B. SIGNATURE

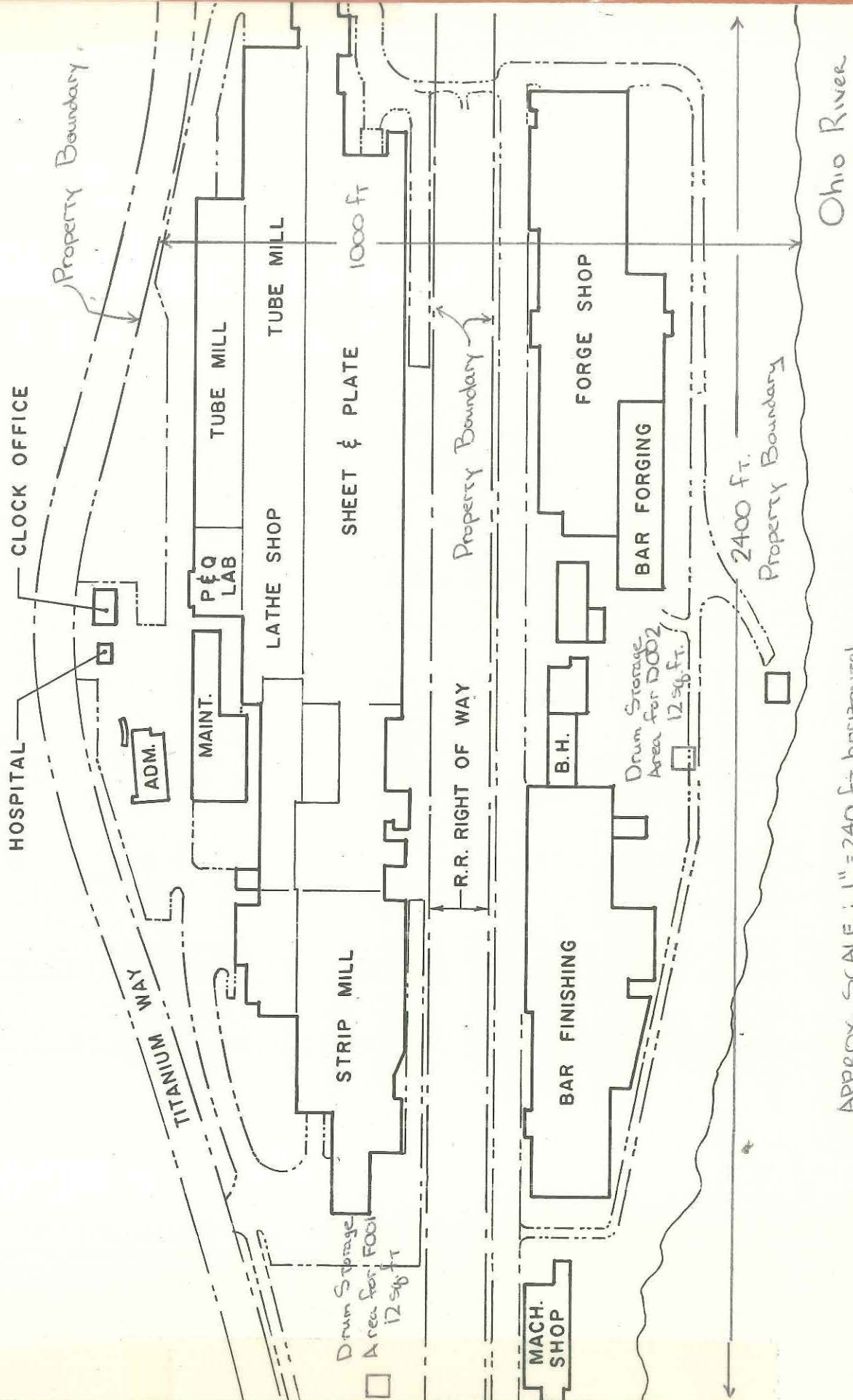
C. DATE SIGNED

J. D. Page
V.P. Manufacturing TIMET Div.

James B. B.

9/8/81

V. FACILITY DRAWING (see page 4)



APPROX. SCALE : 1" = 240 ft horizontal
1" = 160 ft vertical

TIMET

100 TITANIUM WAY, P.O. BOX 309
TORONTO, OHIO • (614) 537-1571

RECEIVED

June 9, 1981

JUN 16 1981
WASTE MANAGEMENT BRANCH
EPA, REGION V

U.S. Environmental Protection Agency
230 South Dearborn Street
Chicago, Illinois 60604

Dear Sir:

Attached is a revised Hazardous Waste Permit Application
for my Company Titanium Metals Corporation of America,
TIMET Division. Our EPA ID No. is OHD098435134. OK

We need to accumulate some of our wastes for more than
90 days, so we can ship full truckloads. The revised
permit application is for a storage facility.

Sincerely,

Deborah F. Stauver
D. R. Stauver
Environmental Engineer

DRS/rw

Attachment

SUB. PART A

JUN 17 1981

JUN 17 1981

TIMET

100 TITANIUM WAY, P.O. BOX 309
TORONTO, OHIO • (614) 537-1571

April 29, 1981

RECEIVED

MAY - 4 1981

WASTE MANAGEMENT BRANCH
EPA, REGION V

United States Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, Illinois 60604

Dear Sir:

I filed the Hazardous Waste Permit Application, Form 3 RCRA for Titanium Metals Corporation, Toronto, Ohio. Our EPA I.D. number is OHD098435134 (generator). I filed this form for one waste, titanium swarf, which I classified as ignitable. Our identification No. as a treatment, storage disposal facility is OHT400011946.

This past week, I spoke with the Ohio EPA, Hazardous Waste Division. Because of the wording in the regulations, they suggested I write the U.S. EPA to have titanium swarf removed from our hazardous waste list.

Characteristic of ignitability, paragraph a 2 states:

"It is not a liquid and is capable, under standard temperature and pressure, of causing fire through friction, absorption of moisture or spontaneous chemical changes and, when ignited; burns so vigorously and persistently that (it) creates a hazard."

Titanium swarf is not a liquid. It is not capable of causing fire through friction, etc., under standard temperature and pressure. But, titanium swarf, when ignited, burns vigorously. This is why I classified it. Titanium swarf does not meet the requirements of the first part of the statement. The word "and" means both parts of the statement. Therefore, I should never have listed it as a hazardous waste.

If titanium swarf is not a hazardous waste, my company will not have a treatment storage and disposal facility.

Please investigate this. If you need more information, please contact me.

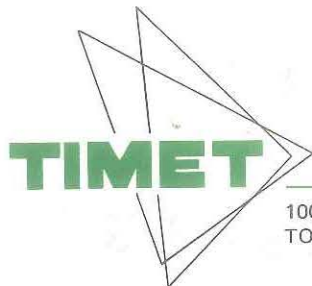
Sincerely,

Deborah R. Stauver
D. R. Stauver
Environmental Engineer

MAY 0 4 1981

DRS/rw

A Division of Titanium Metals Corporation of America



100 TITANIUM WAY, P.O. BOX 309
TORONTO, OHIO • (614) 537-1571

February 26, 1981

Part 2 amendment
RECEIVED
MAY 08 1981
WASTE MANAGEMENT BRANCH
EPA, REGION V

U. S. Environmental Protection Agency
230 South Dearborn Street
Chicago, Illinois 60604

Dear Sir:

When I filled out Form 1 General Information for
my Company -

Titanium Metals Corp. of America
100 Titanium Way P. O. Box 309
Toronto, Ohio 43964
EPA I.D. Number OHDO98435134

I left off our NPDES Permit Number on item X.
Our permit expired and I have found that the
renewed permit number will remain the same. Our
Ohio EPA NPDES Permit No. is E010*AD.0400/0910

Please add this information to our file.

Sincerely,

Debby Stauver
D. R. Stauver
Environmental Engineer

DRS/rw

IRREG. SUB. PART A

*Make addition to
original Form 1*

MAY 12 1981

MAY 12 1981

**A.4 Closure/
Post-Closure**



CHUBB & SON INC.

Manager

51 John F. Kennedy Parkway, Short Hills, New Jersey 07078

RECEIVED
JUN 2 1982

FEDERAL INSURANCE COMPANY

PERFORMANCE BOND

DATE BOND EXECUTED
EFFECTIVE DATE:

JUNE 30, 1982
JULY 1, 1982

PRINCIPAL:

TITANIUM METALS CORPORATION OF AMERICA
400 ROUSER ROAD, P. O. BOX 2824
PITTSBURGH, PENNSYLVANIA 15230

TYPE OF ORGANIZATION:
STATE OF INCORPORATION:

CORPORATION
Delaware

SURETY:

FEDERAL INSURANCE COMPANY
51 J. F. K. PARKWAY
SHORT HILLS, NEW JERSEY 07078

EPA IDENTIFICATION NUMBER:

NV0000060

CLOSURE BOND:

AMOUNT:
FACILITY:

\$880,000.
TITANIUM METALS CORPORATION OF AMERICA
Henderson, Nevada 89015

EPA IDENTIFICATION NUMBER:

OHD-098435134

CLOSURE BOND:

AMOUNT:
FACILITY:

\$40,000.
TITANIUM METALS CORPORATION OF AMERICA
Route 7, Toronto, Ohio 43964

TOTAL PENAL SUM OF BOND:

NINE HUNDRED TWENTY THOUSAND and 00/100--(\$920,000.00)

SURETY BOND NUMBER:

8093-72-29

KNOW ALL MEN BY THESE PRESENTS, that we, the PRINCIPAL and SURETY hereto are firmly bound to the U. S. ENVIRONMENTAL PROTECTION AGENCY (hereinafter called EPA), in the above penal sum for the payment of which we bind ourselves, our heirs, executors, administrators, successors, and assigns jointly and severally; provided that, the SURETY binds itself, jointly and severally with the PRINCIPAL, for the payment of such sum only as is set forth in the full amount of the penal sum of the Bond.

WHEREAS said PRINCIPAL is required, under the Resource Conservation and Recovery Act as amended (RCRA), to have a permit in order to own or operate each hazardous waste management facility identified above, and

WHEREAS said PRINCIPAL is required to provide financial assurance for closure, or closure and post-closure care, as a condition of the permit, and

WHEREAS said PRINCIPAL shall establish a standby trust fund as is required when a Surety Bond is used to provide such financial assurance;

NOW, THEREFORE, the conditions of this obligation are such that if the PRINCIPAL shall faithfully perform closure, whenever required to do so, of each facility for which this Bond guarantees closure, in accordance with the closure plan and other requirements of the permit as such plan and permit may be amended, pursuant to all applicable laws, statutes, rules, and regulations, as such laws, statutes, rules, and regulations may be amended.

PERFORMANCE BOND #8093-72-29

PRINCIPAL: TITANIUM METALS CORPORATION OF AMERICA

CLOSURE BOND

EFFECTIVE: JULY 1, 1982

PAGE TWO

AND, if the PRINCIPAL shall faithfully perform post-closure care of each facility for which this Bond guarantees post-closure care, in accordance with the post-closure plan and other requirements of the permit, as such plan and permit may be amended, pursuant to all applicable laws, statutes, rules, and regulations, as such laws, statutes, rules, and regulations may be amended.

OR, if the PRINCIPAL shall provide alternate financial assurance as specified in Subpart H of 40 CFR Part 264, and obtain the EPA Regional Administrator's written approval of such assurance, within 90 days after the date notice of cancellation is received by both the PRINCIPAL and the EPA Regional Administrator from the SURETY, then this obligation shall be null and void, otherwise it is to remain in full force and effect.

THE SURETY shall become liable on this Bond obligation only when the PRINCIPAL has failed to fulfill the conditions described above.

UPON notification by an EPA Regional Administrator that the PRINCIPAL has been found in violation of the closure requirements of 40 CFR Part 264, for a facility for which this Bond guarantees performances of closure, the SURETY shall either perform closure in accordance with the closure plan and other permit requirements or place the closure amount guaranteed for the facility into the standby trust fund as directed by the EPA Regional Administrator.

UPON notification by an EPA Regional Administrator that the PRINCIPAL has been found in violation of the post-closure requirements of 40 CFR Part 264 for a facility for which this Bond guarantees performance of post-closure care, the SURETY shall either perform post-closure care in accordance with the post-closure plan and other permit requirements or place the post-closure amount guaranteed for the facility into the standby trust fund as directed by the EPA Regional Administrator.

UPON notification by an EPA Regional Administrator that the PRINCIPAL has failed to provide alternate financial assurance as specified in Subpart H of 40 CFR Part 264, and obtain written approval of such assurance from the EPA Regional Administrator during the 90 days following receipt by both the PRINCIPAL and the EPA Regional Administrator of a notice of cancellation of the Bond, the SURETY shall place funds in the amount guaranteed for the facilities into the standby trust fund as directed by the EPA Regional Administrator.

THE SURETY hereby waives notification of amendments to closure plans, permits, applicable laws, statutes, rules, and regulations and agrees that no such amendment shall in any way alleviate its obligation on this Bond.

The liability of the SURETY shall not be discharged by any payment or succession of payments hereunder, unless and until such payment or payments shall amount in the aggregate to the penal sum of the Bond, but in no event shall the obligation of the SURETY hereunder exceed the amount of said penal sum.

THE SURETY may cancel the Bond by sending notice of cancellation by certified mail to the owner or operator and to the EPA Regional Administrator for the Region in which the facilities are located, provided, however, that cancellation shall not occur during the 120 days beginning on the date of receipt of the notice of cancellation by both the PRINCIPAL and the EPA Regional Administrator, as evidenced by the return receipts.

THE PRINCIPAL may terminate this Bond by sending written notice to the SURETY, provided, however, that no such notice shall become effective until the SURETY receives written authorization for termination of the Bond by the EPA Regional Administrator of the EPA Region in which the bonded facilities are located.

IN WITNESS WHEREOF, the PRINCIPAL and SURETY have executed this Performance Bond and have affixed their seals on the date set forth above.

PERFORMANCE BOND #8093-72-29

PRINCIPAL: TITANIUM METALS CORPORATION OF AMERICA

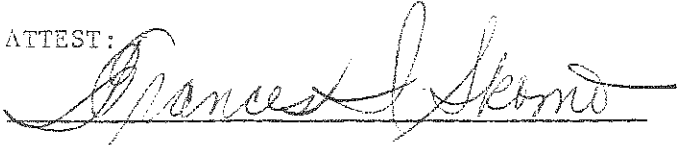
CLOSURE BOND

EFFECTIVE: JULY 1, 1982

PAGE THREE

THE persons whose signatures appear below hereby certify that they are authorized to execute this Surety Bond on behalf of the PRINCIPAL and SURETY and that the wording of this Surety Bond is identical to the wording specified in 40 CFR 264.151(c) as such regulation was constituted on the date this Bond was executed. (Excluding non-applicable wording concerning Co-Sureties).

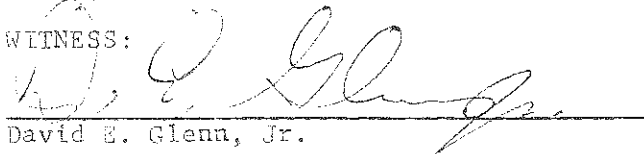
ATTEST:



TITANIUM METALS CORPORATION OF AMERICA

By  (Seal)

WITNESS:


David E. Glenn, Jr.

FEDERAL INSURANCE COMPANY

By  (Seal)

Margaret Caffagno, Attorney-in-Fact

FEDERAL INSURANCE COMPANY

51 J.F.K. PARKWAY

SHORT HILLS, NEW JERSEY 07078

a NEW JERSEY CORPORATION

LIABILITY LIMIT: SEE FEDERAL REGISTER

ANNUAL BOND PREMIUM: \$3,450.00

POWER OF ATTORNEY

Know all Men by these Presents, That the FEDERAL INSURANCE COMPANY, 100 William Street, New York, New York, a New Jersey Corporation, has constituted and appointed, and does hereby constitute and appoint Margaret Carfagno, R. P. Crawford, Jr., Daniel T. Humphries, David E. Glenn, Jr., K. I. Flickinger and Lois Cutruzzula of Pittsburgh, Pennsylvania-----

each its true and lawful Attorney-in-Fact to execute under such designation in its name and to affix its corporate seal to and deliver for and on its behalf as surety thereon or otherwise, bonds or obligations given or executed in the course of its business, and any instruments amending or altering the same, and consents to the modification or alteration of any instruments referred to in said bonds or obligations.

In Witness Whereof, the said FEDERAL INSURANCE COMPANY has, pursuant to its By-Laws, caused these presents to be signed by its Assistant Vice-President and Assistant Secretary and its corporate seal to be hereto affixed this

30th day of March 19 82

FEDERAL INSURANCE COMPANY
By



George McClellan
Assistant Vice-President

Richard D. O'Connor
Assistant Secretary

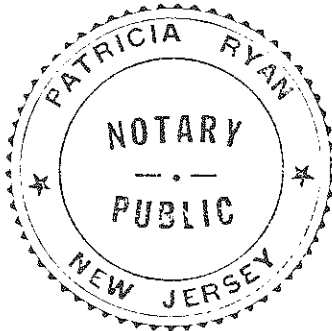
STATE OF NEW JERSEY }

ss:

County of Essex

On this 30th day of March 19 82 before me personally came Richard D. O'Connor to me known and by me known to be Assistant Secretary of the FEDERAL INSURANCE COMPANY, the corporation described in and which executed the foregoing Power of Attorney, and the said Richard D. O'Connor being by me duly sworn, did depose and say that he is Assistant Secretary of the FEDERAL INSURANCE COMPANY and knows the corporate seal thereof; that the seal affixed to the foregoing Power of Attorney is such corporate seal and was thereto affixed by authority of the By-Laws of said Company, and that he signed said Power of Attorney as Assistant Secretary of said Company by like authority; and that he is acquainted with George McClellan and knows him to be the Assistant Vice-President of said Company, and that the signature of said George McClellan subscribed to said Power of Attorney is in the genuine handwriting of said George McClellan and was thereto subscribed by authority of said By-Laws and in deponent's presence.

Acknowledged and Sworn to before me
on the date above written.



Notary Public

PATRICIA RYAN
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires December 11, 19 83

CITY OF SHORT HILLS }
County of Essex } ss.

I, the undersigned, Assistant Secretary of the FEDERAL INSURANCE COMPANY, do hereby certify that the following is a true excerpt from the By-Laws of the said Company as adopted by its Board of Directors on March 11, 1953 and amended May 27, 1971 and that this By-Law is in full force and effect.

"ARTICLE XVIII

Section 2. All bonds, undertakings, contracts and other instruments other than as above for and on behalf of the Company which it is authorized by law or its charter to execute, may and shall be executed in the name and on behalf of the Company either by the Chairman or the Vice-Chairman or the President or a Vice-President, jointly with the Secretary or an Assistant Secretary, under their respective designations, except that any one or more officers or attorneys-in-fact designated in any resolution of the Board of Directors or the Executive Committee, or in any power of attorney executed as provided for in Section 3 below, may execute any such bond, undertaking or other obligation as provided in such resolution or power of attorney.

Section 3. All powers of attorney for and on behalf of the Company may and shall be executed in the name and on behalf of the Company, either by the Chairman or the Vice-Chairman or the President or a Vice-President or an Assistant Vice-President, jointly with the Secretary or an Assistant Secretary, under their respective designations."

And I further certify that I have compared the foregoing copy of the POWER OF ATTORNEY with the original thereof and the same is a correct and true copy of the whole of said original Power of Attorney and that said Power of Attorney has not been revoked.

And I further certify that said FEDERAL INSURANCE COMPANY is duly licensed to transact fidelity and surety business in each of the States of the United States of America, District of Columbia, Puerto Rico, and each of the Provinces of Canada with the exception of Prince Edward Island; and is also duly licensed to become sole surety on bonds, undertakings, etc., permitted or required by law.

Given under my hand and the seal of said Company at Short Hills, N.J., this 30th day of June, 19 82.

M B Bueckman
Assistant Secretary

**C.2 Compliance/
Enforcement**



Land and Chemicals Division

Type of Document: ☒ Notice of Violation Letter and Letter of Acknowledgment
☐ No Violation Letter and Inspection Report/Checklist
☐ Letter of Acknowledgment
☐ Information Request
☐ Pre-Filing and Opportunity to Confer
☐ State Notification of Enforcement Action


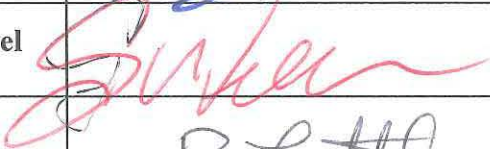

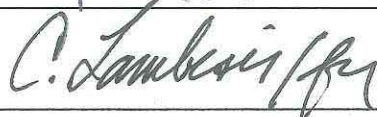
Facility Name: Titanium Metals Corporation

Facility Location: 100 Titanium Way

City: Toronto State: Ohio

U.S. EPA ID No. OHD 098 435 134

Assigned Staff W. Francis Phone: 312-353-4921

Name	Signature	Date
Author W. Francis		6/6/12
Regional Counsel J. Williams		6/12/12
Section Chief P. Little		6-13-12
Branch Chief G. Victorine		6-15-12

Directions/Request for Clerical Support:

After the Section Chief/Branch Chief signs this sheet and original letter:

1. Date stamp the cover letter;
2. Make four copies of the contents of this folder:
 - One copy for the assigned staff;
 - One copy for the section file;
 - One copy for the branch file; and
 - One copy for the official file.
3. Make any additional copies for cc=s or bcc=s.
4. Mail the original certified mail and distribute office copies and cc=s and bcc=s.
Once the certified mail receipt is returned:
5. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7th floor RCRA file room;
6. E-mail staff the date that the letter was received by facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

JUN 15 2012

REPLY TO THE ATTENTION OF:

LR-8J

CERTIFIED MAIL 7009 1680 0000 7644 9335

RETURN RECEIPT REQUESTED

Mr. Thomas J. Bottorf
Environmental Engineer
Titanium Metals Corporation
100 Titanium Way
Post Office Box 309
Toronto, Ohio 43964

Re: Notice of Violation
Titanium Metals Corporation, Toronto, Ohio
OHD 098 435 134

Dear Mr. Bottorf:

On June 28, 2011 representatives of the U.S. Environmental Protection Agency and Ohio Environmental Protection Agency (Ohio EPA) inspected the Titanium Metals Corporation (Timet) facility located in Toronto, Ohio. The purpose of the inspection was to evaluate Timet's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the generation of hazardous waste. Please find enclosed a copy of the RCRA inspection report for your reference. In addition, EPA acknowledges receiving several e-mails and a facsimile from you since the inspection.

Based on information provided by Timet personnel, review of records and physical observations by the inspectors, EPA finds that Timet violated certain requirements of the Ohio Administrative Code (OAC) and the United States Code of Federal Regulations (CFR). We find that Timet was in noncompliance with the storage permit exemption and in violation of the following generator requirements:

- 1) In order to avoid the need for a hazardous waste storage permit, a large quantity generator that is placing waste in tanks must comply with OAC Rules 3745-66-90 to 3745-66-101, except paragraph (C) of OAC Rule 3745-66-97 and OAC Rule 3745-66-100. See, OAC Rule 3745-52-34(A)(1)(b) and (A)(4). Specifically, while being accumulated and/or treated on-site, each tank must be labeled or marked clearly with the words "Hazardous Waste." See, OAC Rule 3745-52-34(A)(3) [40 CFR § 262.34(a)(3)].

During the inspection of the Titanium Metals "Plate Pickling Operation Tank Farm" (see photograph numbers 1 and 2, "Coil Department/Strip Mill Tank Farm" (see photograph number 3), and the "Sheet Finishing Area" (see photograph number 4), the inspectors observed that the three hazardous waste tanks were not labeled with the words "Hazardous Waste". At the time of the inspection, Titanium Metals was in violation of OAC Rule 3745-52-34(A)(3) [40 CFR § 262.34(a)(3)]. On June 28, 2011 Timet sent photographs to EPA of the "before and after" labeled spent acid tanks. EPA considers this violation resolved.

- 2) A small quantity handler of universal waste must manage lamps in a way that prevents releases of any universal waste or component of a universal waste to the environment. Specifically, a small quantity handler of universal waste must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions. See, OAC Rule 3745-273-13(D)(1) [40 CFR § 273.13(d)(1)]. In addition, each lamp or a container or package in which such lamps are contained must be labeled or marked clearly with one of the following phrases: "Universal Waste-Lamp(s)," or "Waste Lamp(s)," or "Used Lamp(s)." See, OAC Rule 3745-273-14(E) [40 CFR § 273.14(e)].

During the inspection of the Maintenance Shop Universal Waste Accumulation Area, the inspectors observed two containers and several uncontainerized used fluorescent lamps, see photograph number 5. In addition, the containers were not labeled or marked with one of the following phrases "Universal Waste-Lamp(s)," or "Waste Lamp(s)," or "Used Lamp(s)." Timet was in violation of OAC Rule 3745-273-13(D)(1) [40 CFR § 273.13(d)(1)] and OAC Rule 3745-273-14(E) [40 CFR § 273.14(e)]. On June 30, 2011 Timet sent EPA two photographs of the universal waste accumulation area. All lamps were boxed up with labels attached. EPA considers this violation resolved.

This letter is to inform you that EPA has reviewed the referenced responses, and does not plan additional enforcement action at this time. This letter does not limit the applicability of the requirements evaluated, or of other federal or state statutes or regulations. EPA and the Ohio EPA will continue to evaluate your facility in the future.

If you have any questions regarding this letter, please contact Walt Francis, of my staff, at (312) 353-4921.

Sincerely,

A handwritten signature in black ink, appearing to read "C. Lamberis / for".

Gary Victorine, Chief
RCRA Branch

cc: Melody Stewart, Ohio EPA-Southeast District Office
(melody.stewart@epa.state.oh.us)

Enclosures

bcc: Joe Williams, C-14J

U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 W. JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

FACILITY NAME: TITANIUM METALS CORPORATION

FACILITY U.S. EPA ID NO.: OHD 098 435 134

FACILITY TYPE: Large Quantity Generator

FACILITY ADDRESS: 100 Titanium Way
Toronto, Ohio 43964

U.S. EPA REPRESENTATIVE: Walt Francis

DATE(S) OF INSPECTION: June 28, 2011

SIC CODE: 3356 – Rolling, Drawing, and Extruding of Nonferrous Metals, Except Copper and Aluminum

NAICS CODE: 331491 – Nonferrous Metal (Except Copper and Aluminum) Rolling, Drawing, and Extruding
335929 – Other Communication and Energy Wire Manufacturing

PREPARED BY: Walt Francis
Walt Francis
Environmental Scientist

7/18/2011
Date

ACCEPTED BY: P. Little
Paul Little, Chief
Compliance Section 2
RCRA Branch

7-19-11
Date

Purpose of Inspection

The purpose of this inspection was to conduct a Compliance Evaluation Inspection (CEI) at the Titanium Metals Corporation (Timet), Toronto, Ohio to determine its compliance with the Resource Conservation and Recovery Act (RCRA) and the Ohio Administrative Code (OAC) with respect to Timet's management of hazardous waste, universal waste and used oil.

Participants

U.S. Environmental Protection Agency (U.S. EPA) Inspector -
Walt Francis, Environmental Scientist

Ohio Environmental Protection Agency (Ohio EPA) Inspector -
Melody Stewart, Hazardous Waste Inspector

Representative of Titanium Metals Corporation -
Thomas J. Bottorf, Environmental Engineer

Site Description/Background Information

Timet is a titanium metals processing plant that produces intermediate mill products in rolled sheets or in tubular form. Titanium ingots are heated and then pressed into sheets. Sheets are typically shotblasted with steel shot (BBs) to clean them before they are immersed into pickling baths and steel grit is used in a unit called the "Rotoblast" to remove scale. Aluminum oxide grit is utilized in the "Auto Air Blast" on flat products to remove stains on the metal and aluminum oxide grit is utilized in a unit called the "Blast Room" where an operator using a handheld nozzle, blasts the round or very small pieces inside an enclosed room. Approximately 75 percent of the facility's end products are used in the aircraft industry. Titanium Metals purchased the property from Ohio River Steel Company in 1957 and occupies 51 acres. The Timet facility is located on the southern edge of Toronto, Ohio and is bordered on the north by Jeddo Run (a small stream), on the west by Titanium Way, on the south by open land, and on the east by the Ohio River. Timet employs 650 people and operates three shifts, 7 days per week.

The facility generates used oil, universal waste, grinding swarf, scrap metal, baghouse blower dust, waste pickling acid (spent hydrofluoric (HF)/nitric acid solution, and spent HF acid solution), used parts washer solvent, and waste paint and solvents from the Paint Shop. The largest waste stream is the HF/nitric acid solution which is corrosive and contains chromium (D007) and lead (D008).

Opening Conference

On June 28, 2011, Walt Francis and Melody Stewart arrived at the Timet, Toronto, Ohio facility at approximately 9:00 a.m. and informed Mr. Bottorf of the nature, scope, and procedures for the

RCRA inspection. The inspection was conducted by U.S. EPA and Ohio EPA personnel as a Federal lead inspection. Mr. Bottorf provided the team with an overview of the facility and the various hazardous waste and solid wastes that are generated. Mr. Bottorf allowed the inspectors access to the facility to conduct the inspection.

Site Tour

The walk-through began in the Sheet and Plate Shop. Mr. Bottorf showed the inspectors the hazardous waste container less than 90 day accumulation area. The inspection continued to the Forge Shop. Mr. Bottorf showed the inspectors the Forge Shop. The inspection continued to the Oil Reclamation Building. Mr. Bottorf showed the inspectors two 4,000 gallon used oil tanks. Mr. Bottorf told the inspectors that Safety-Kleen picks up the used oil. The inspection continued to the baghouse pit swarf area. Mr. Bottorf told the inspectors that the baghouse pit swarf is shipped off-site to a municipal landfill. The inspection continued to "Deep Well #5". Mr. Bottorf showed the inspectors one of the ground-water pumping wells. The inspection continued to the Inspection Building, the Torch Shop, and the pickling operation. Mr. Bottorf explained to the inspectors that large titanium plates are placed in baths of HF nitric acid, in a bath of nitric acid and a nitric acid rinse bath. The inspection continued to the Plate Shop Tank Farm. Mr. Bottorf showed the inspectors an 18,000 gallon tank of waste titanium fluoride, see photograph number 1. Mr. Bottorf told the inspectors that the tank is emptied approximately every three weeks. Inspector Francis noted that the tank was not labeled "Hazardous Waste". In addition, Inspector Francis asked Mr. Bottorf about the standing water in the secondary containment, see photograph number 2. Mr. Bottorf told the inspectors that it had rained during the night. The inspection continued to the Paint Shop. Mr. Bottorf showed the inspectors a 55-gallon container utilized for waste paint shop liquids and a 55-gallon container utilized for waste rags. Inspector Francis asked about a parts washer in the Paint Shop. Mr. Bottorf told the inspectors that it was utilized for cleaning spray guns. Inspector Francis asked Mr. Bottorf how the used spray booth filters are handled. Mr. Bottorf told the inspectors that the spray booth filters are placed in the general trash. The inspection continued to the Blast Room. Mr. Bottorf explained that items are blasted with aluminum grit. Mr. Bottorf told the inspectors that any used aluminum grit media is sent off-site for its aluminum value. The inspection continued to the Coil Department. Mr. Bottorf showed the inspectors another tank farm with a titanium fluoride solution waste tank, see photograph number 3. Inspector Francis noted that a hose was labeled "Hazardous Waste", but the tank itself was not labeled "Hazardous Waste". The inspection continued to the grinding swarf accumulation area. Mr. Bottorf told the inspectors that he was working on a contract to sell the grinding swarf. The inspection continued to the swarf filter media area. Mr. Bottorf told the inspectors that the swarf filter media is shipped to Ross Environmental or WTI. The inspection continued to the Sheet Finishing tank farm. Mr. Bottorf showed the inspectors a 6,000 gallon tank used for accumulation of waste HF acid, see photograph number 4. The inspectors observed that the waste HF acid tank was not labeled "Hazardous Waste". The inspection continued to the on-site laboratory. Mr. Bottorf showed the inspectors the sonic testing laboratory, multi-zone inspection and tensile testing area. The inspection continued to the Maintenance Shop where Timet accumulates eight foot and four foot used fluorescent lamps in

an outside area (see photograph number 5), and then to the Vehicle Repair area.

The inspectors then returned to Mr. Bottorf's office to review records.

Records Review

A record review was conducted. The inspection team requested to review hazardous waste manifests, land disposal restriction forms, universal waste and used oil shipping records, personnel training information, weekly and daily inspection logs, and the latest version of the contingency plan. The inspectors reviewed hazardous waste manifests for the past three years, two years of personnel training records, waste profiles, hazardous waste less than 90-day hazardous waste accumulation area weekly and daily inspection logs. Universal Waste was being shipped to USA Lamp, Mason, Michigan, and the date of the last off-site shipment was 4/29/2011. Used oil was being picked up by Safety-Kleen, Wheeling, West Virginia. The inspectors reviewed a Contingency Plan that was last updated in March 2011.

Closing Conference

The inspectors conducted a closing conference. Inspector Francis explained that he would review his notes from the inspection, and generate an inspection report. Timet would then receive a letter from U.S. EPA regarding the inspection including a copy of the inspection report, completed inspection checklists, and photographs. The inspectors mentioned the hazardous waste tank labeling requirements and universal waste labeling requirements to Mr. Bottorf.

Attachments

Inspection Checklists.

RCRA HAZARDOUS WASTE GENERATOR INSPECTION CHECKLIST

Company: Titanium Metals Corporation EPA ID#: OHD 098 435 134
 Street: 100 Titanium Way City: Toronto
 County: Jefferson State: Ohio Zip: 43964
 Mailing Address: Same
 (If different from above)
 Telephone: 740-537-5672 Fax #: _____
 Owner/Operator: _____
 (If different from above)
 Street: _____
 City: _____ State: Ohio Zip: _____
 Inspection Date(s): 6/28/2011 Time(s): 9:00 am
 Inspection Announced? Yes X NO If so, how much advance notice given? _____

	Name	Affiliation	Telephone
Inspectors:	Walt Francis	U.S. EPA	312-353-4921
	Melody Stewart	Ohio EPA	740-380-5256
Facility Representative:	Thomas Bottorf	Titanium Metals	740-537-5672

Complete All Other Applicable Checklists	
Generator Classification	Waste Management Activity
<input type="checkbox"/> Conditionally Exempt SQG (CESQG)	<input checked="" type="checkbox"/> Containers
<input type="checkbox"/> Small Quantity Generator (SQG)	<input checked="" type="checkbox"/> Tank(s)
<input checked="" type="checkbox"/> Large Quantity Generator (LQG)	<input type="checkbox"/> Land Disposal Requirements (LDR)
<input type="checkbox"/> No Generation	<input checked="" type="checkbox"/> Used Oil
	<input checked="" type="checkbox"/> Universal Waste
	<input type="checkbox"/> Other

CESQG: < 100 Kg. (approximately 25-30 gallons) of waste in a calendar month.

SQG: Between 100 and 1,000 Kg. (about 25 to under 300 gallons) of waste in a calendar month.

LQG: >1,000 Kg. (~300 gallons) of waste in a calendar month or > 1 Kg. of acutely hazardous waste in a calendar month.

NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds

**COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY
NOTE TO THE INSPECTOR**

**LARGE QUANTITY GENERATOR REQUIREMENTS
COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY**

CESQG: ≤100Kg. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.
 SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.
 LQG: ≥ 1,000 Kg. (~300 gallons) of waste in a calendar month or ≥1 Kg. of acutely hazardous waste in a calendar month.
NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.

Safety Equipment Used:

GENERAL REQUIREMENTS

1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
2.	Are records of waste determination being kept for at least 3 years? [3745-52-40(C)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
3.	Has the generator obtained a U.S. EPA identification number? [3745-52-12]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
4.	Were annual reports filed with Ohio EPA on or before March 1 st ? [3745-52-41(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
5.	Are annual reports kept on file for at least 3 years? [3745-52-40(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
6.	Has the generator transported or caused to be transported hazardous waste to other than a facility authorized to manage the hazardous waste? [ORC 3734.02(F)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
7.	Has the generator disposed of hazardous waste on-site without a permit or at another facility other than a facility authorized to dispose of the hazardous waste? [ORC 3734.02(E)&(F)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
8.	Does the generator accumulate hazardous waste?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

NOTE: If the LQG does not accumulate or treat hazardous waste, it is not subject to 52-34 standards. All other requirements still apply, e.g., annual reports, manifest, marking, record keeping, LDR, etc.

9.	Has the generator accumulated hazardous waste on-site in excess of 90 days without a permit or an extension from the director ORC §3734.02(E)&(F)?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
----	--	------------------------------	--	------------------------------

NOTE: If F006 waste is generated and accumulated for > 90 days and is recycled see 3745-52-34(G)&(H).

10.	Does the generator treat hazardous waste in a: [ORC 3734.02(E)&(F)]	
a.	Container that meets 3745-66-70 to 3745-66-77?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
b.	Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Drip pads that meet 3745-69-40 to 3745-69-45?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	Containment building that meets 3745-256-100 to 3745-256-102?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

NOTE: Complete appropriate checklist for each unit.

NOTE: If waste is treated to meet LDRs, use LDR checklist.

11.	Does the generator export hazardous waste? If so:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Has the generator notified U.S. EPA of export activity? [3745-52-53(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Has the generator complied with special manifest requirements? [3745-52-54]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	Has an annual report been submitted to U.S. EPA? [3745-52-56]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

[Facility Name/Inspection Date]
 [ID number]
 LQG/August 2009
 Page 1 of 6

e.	Are export related documents being maintained on-site? [3745-52-57(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
MANIFEST REQUIREMENTS		
12.	Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
13.	Have items (1) through (20) of each manifest been completed? [3745-52-20(A)(1)]&[3745-52-27(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations items (21) through (35) must also be completed. [3745-52-20(A)(1)]		
14.	Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: The generator may designate on the manifest one alternate facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)].		
15.	If the transporter was unable to deliver a shipment of hazardous waste to the designated facility did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
16.	Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1)&(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
17.	If the generator received a rejected load or residue and accumulated the waste on-site, did the generator sign item 18c or 20 of the manifest? [3745-52-34(M)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
NOTE: Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have a program in place to reduce the volume and toxicity waste they generate.		
18.	If the generator did not receive a return copy of each completed manifest within 35 days of the waste being accepted by the transporter, did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
19.	If the generator has not received the manifest within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
20.	Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: Waste generated at one location and transported along a publicly accessible road for temporary consolidated storage or treatment on a contiguous property also owned by the same person is not considered "on-site" and manifesting and transporter requirements must be met. To transport "along" a public right-of-way the destination facility has to act as a transfer facility or have a permit because this is considered to be "off-site." For additional information see the definition of "on-site" in OAC rule 3745-50-10.		
PERSONNEL TRAINING		
21.	Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to their positions? [3745-65-16(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
22.	Does the personnel training program, at a minimum, include instructions to ensure that facility personnel are able to respond effectively to emergencies involving hazardous waste by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-65-16(A)(3)(a-f)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
23.	Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
24.	Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
25.	Does the generator provide annual refresher training to employees? [3745-65-16(C)] <i>last Training 4/26/11</i>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
26.	Does the generator keep records and documentation of:	
a.	Job titles? [3745-65-16D(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

[Facility Name/Inspection Date]

[ID number]

LQG/August 2009

Page 2 of 6

b.	Job descriptions? [3745-65-16D(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Type and amount of training given to each person? [3745-65-16D(3)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	Completed training or job experience required? [3745-65-16D(4)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
27.	Are training records for current personnel kept until closure of the facility and are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

NOTE: The following section can be used by the inspector to document that all personnel who are involved with hazardous waste management have been trained. The employees who need training (written and/or on-the-job) may include the following: environmental coordinators, drum handlers, emergency coordinators, personnel who conduct hazardous waste inspections, emergency response teams, personnel who prepare manifest, etc.

Job Performed	Name of Employee	Date Trained
GUAR BATTERY MFG.	GUAR BATTERY	4/26/11
MARS	SAM GRAVINO	4/26/11
MARS.	DAVID SWICKARD	4/26/11

CONTINGENCY PLAN

28.	Does the owner/operator have a contingency plan to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)] <i>MARS 2011 Version</i>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
29.	Does the plan describe the following:	
a.	Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste? [3745-65-52(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Arrangements with emergency authorities? [3745-65-52(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? [3745-65-52(D)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	A list of all emergency equipment, including: location, a physical description and brief outline of capabilities? [3745-65-52(E)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
e.	An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

NOTE: If the facility already has a "Spill Prevention, Control and Countermeasures Plan" under CFR Part 112 or 40 CFR Part 1510, or some other emergency plan, the facility can amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with OAC requirements. [3745-65-52(B)]

30.	Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53(A)&(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
31.	Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, or failure of the plan? [3745-65-54]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
32.	Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

NOTE: The emergency coordinator shall be thoroughly familiar with: (a) all aspects of the facility's contingency plan; (b) all operations and activities at the facility; (c) the location and characteristics of waste handled; (d) the location of all records within the facility; (e) facility layout; and (f) shall have the authority to commit the resources needed to implement provisions of the contingency plan.

EMERGENCY PROCEDURES

33.	Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Was the contingency plan implemented? [3745-65-51(B)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Did the facility follow the emergency procedures in 3745-65-56(A) through (H)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>

[Facility Name/Inspection Date]

[ID number]

LQG/August 2009

Page 3 of 6

	c.	Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(J)?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
<p>NOTE: OAC 3745-65-51(b) requires that the contingency plan be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents, which could threaten human health and the environment.</p>					
PREPAREDNESS AND PREVENTION					
34.		Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
35.		Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste:			
	a.	Internal communications or alarm system? [3745-65-32(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	b.	Emergency communication device? [3745-65-32(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	c.	Portable fire control, spill control and decon equipment? [3745-65-32(C)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	d.	Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
<p>NOTE: Verify that the equipment is listed in the contingency plan.</p>					
36.		Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
37.		Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
38.		Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under 3745-65-32)? [3745-65-34(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
39.		If there is only one employee on the premises, is there immediate access to a device (eg., phone, hand held two-way radio) capable of summoning external emergency assistance (unless not required under 3745-65-32)? [3745-65-34(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
40.		Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
41.		Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
42.		Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
SATELLITE ACCUMULATION AREA REQUIREMENTS					
43.		Does the generator ensure that satellite accumulation area(s):			
	a.	Are at or near a point of generation? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	b.	Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	c.	Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	d.	Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	e.	Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	f.	Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
44.		Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so:	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>

**LARGE QUANTITY GENERATOR REQUIREMENTS
COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY**

CESQG: ≤100Kg. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.
 SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.
 LQG: ≥ 1,000 Kg. (~300 gallons) of waste in a calendar month or ≥1 Kg. of acutely hazardous waste in a calendar month.
 NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.

Safety Equipment Used:

GENERAL REQUIREMENTS

1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
2.	Are records of waste determination being kept for at least 3 years? [3745-52-40(C)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
3.	Has the generator obtained a U.S. EPA identification number? [3745-52-12]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
4.	Were annual reports filed with Ohio EPA on or before March 1 st ? [3745-52-41(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
5.	Are annual reports kept on file for at least 3 years? [3745-52-40(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
6.	Has the generator transported or caused to be transported hazardous waste to other than a facility authorized to manage the hazardous waste? [ORC 3734.02(F)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
7.	Has the generator disposed of hazardous waste on-site without a permit or at another facility other than a facility authorized to dispose of the hazardous waste? [ORC 3734.02(E)&(F)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
8.	Does the generator accumulate hazardous waste?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

NOTE: If the LQG does not accumulate or treat hazardous waste, it is not subject to 52-34 standards. All other requirements still apply, e.g., annual reports, manifest, marking, record keeping, LDR, etc.

9.	Has the generator accumulated hazardous waste on-site in excess of 90 days without a permit or an extension from the director ORC §3734.02(E)&(F)?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
----	--	------------------------------	--	------------------------------

NOTE: If F006 waste is generated and accumulated for > 90 days and is recycled see 3745-52-34(G)&(H).

10.	Does the generator treat hazardous waste in a: [ORC 3734.02(E)&(F)]	
a.	Container that meets 3745-66-70 to 3745-66-77?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
b.	Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Drip pads that meet 3745-69-40 to 3745-69-45?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	Containment building that meets 3745-256-100 to 3745-256-102?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

NOTE: Complete appropriate checklist for each unit.

NOTE: If waste is treated to meet LDRs, use LDR checklist.

11.	Does the generator export hazardous waste? If so:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Has the generator notified U.S. EPA of export activity? [3745-52-53(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Has the generator complied with special manifest requirements? [3745-52-54]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	Has an annual report been submitted to U.S. EPA? [3745-52-56]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

[Facility Name/Inspection Date]
 [ID number]
 LQG/August 2009
 Page 1 of 6

e.	Are export related documents being maintained on-site? [3745-52-57(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
MANIFEST REQUIREMENTS		
12.	Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
13.	Have items (1) through (20) of each manifest been completed? [3745-52-20(A)(1)]&[3745-52-27(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations items (21) through (35) must also be completed. [3745-52-20(A)(1)]		
14.	Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: The generator may designate on the manifest one alternate facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)]		
15.	If the transporter was unable to deliver a shipment of hazardous waste to the designated facility did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
16.	Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1)&(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
17.	If the generator received a rejected load or residue and accumulated the waste on-site, did the generator sign item 18c or 20 of the manifest? [3745-52-34(M)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
NOTE: Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have a program in place to reduce the volume and toxicity waste they generate.		
18.	If the generator did not receive a return copy of each completed manifest within 35 days of the waste being accepted by the transporter, did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
19.	If the generator has not received the manifest within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
20.	Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: Waste generated at one location and transported along a publicly accessible road for temporary consolidated storage or treatment on a contiguous property also owned by the same person is not considered "on-site" and manifesting and transporter requirements must be met. To transport "along" a public right-of-way the destination facility has to act as a transfer facility or have a permit because this is considered to be "off-site." For additional information see the definition of "on-site" in OAC rule 3745-50-10.		
PERSONNEL TRAINING		
21.	Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to their positions? [3745-65-16(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
22.	Does the personnel training program, at a minimum, include instructions to ensure that facility personnel are able to respond effectively to emergencies involving hazardous waste by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-65-16(A)(3)(a-f)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
23.	Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
24.	Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
25.	Does the generator provide annual refresher training to employees? [3745-65-16(C)] <i>last Training 4/26/11</i>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
26.	Does the generator keep records and documentation of:	
a.	Job titles? [3745-65-16D(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

[Facility Name/Inspection Date]

[ID number]

LQG/August 2009

Page 2 of 6

b.	Job descriptions? [3745-65-16D(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Type and amount of training given to each person? [3745-65-16D(3)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	Completed training or job experience required? [3745-65-16D(4)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
27.	Are training records for current personnel kept until closure of the facility and are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

NOTE: The following section can be used by the inspector to document that all personnel who are involved with hazardous waste management have been trained. The employees who need training (written and/or on-the-job) may include the following: environmental coordinators, drum handlers, emergency coordinators, personnel who conduct hazardous waste inspections, emergency response teams, personnel who prepare manifest, etc.

Job Performed	Name of Employee	Date Trained
GUAST BATTERMAN	GUAST BATTERMAN	4/26/11
MANN	SAM GRADINO	4/26/11
MANN	DAVID SWICKARD	4/26/11

CONTINGENCY PLAN

28.	Does the owner/operator have a contingency plan to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)] <i>MARCH 2011 VERSION</i>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
29.	Does the plan describe the following:	
a.	Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste? [3745-65-52(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Arrangements with emergency authorities? [3745-65-52(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? [3745-65-52(D)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	A list of all emergency equipment, including: location, a physical description and brief outline of capabilities? [3745-65-52(E)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
e.	An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

NOTE: If the facility already has a "Spill Prevention, Control and Countermeasures Plan" under CFR Part 112 or 40 CFR Part 1510, or some other emergency plan, the facility can amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with OAC requirements. [3745-65-52(B)]

30.	Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53(A)&(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
31.	Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, or failure of the plan? [3745-65-54]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
32.	Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

NOTE: The emergency coordinator shall be thoroughly familiar with: (a) all aspects of the facility's contingency plan; (b) all operations and activities at the facility; (c) the location and characteristics of waste handled; (d) the location of all records within the facility; (e) facility layout; and (f) shall have the authority to commit the resources needed to implement provisions of the contingency plan.

EMERGENCY PROCEDURES

33.	Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Was the contingency plan implemented? [3745-65-51(B)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Did the facility follow the emergency procedures in 3745-65-56(A) through (H)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>

[Facility Name/Inspection Date]

[ID number]

LQG/August 2009

Page 3 of 6

c.	Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(J)?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
NOTE: OAC 3745-65-51(b) requires that the contingency plan be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents, which could threaten human health and the environment.				
PREPAREDNESS AND PREVENTION				
34.	Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
35.	Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste:			
a.	Internal communications or alarm system? [3745-65-32(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
b.	Emergency communication device? [3745-65-32(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
c.	Portable fire control, spill control and decon equipment? [3745-65-32(C)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
d.	Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
NOTE: Verify that the equipment is listed in the contingency plan.				
36.	Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
37.	Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
38.	Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under 3745-65-32)? [3745-65-34(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
39.	If there is only one employee on the premises, is there immediate access to a device (eg., phone, hand held two-way radio) capable of summoning external emergency assistance (unless not required under 3745-65-32)? [3745-65-34(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
40.	Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
41.	Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
42.	Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
SATELLITE ACCUMULATION AREA REQUIREMENTS				
43.	Does the generator ensure that satellite accumulation area(s):			
a.	Are at or near a point of generation? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
b.	Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
c.	Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
d.	Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
e.	Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
f.	Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
44.	Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so:	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>

a.	Did the generator comply with 3745-52-34(A)(1) through (4) or other applicable generator requirements within three days? [3745-52-34(C)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

NOTE: The satellite accumulation area is limited to 55 gallons of hazardous waste accumulated from a distinct point of generation in the process under the control of the operator of the process generating the waste (less than 1 quart for acute hazardous waste). There could be individual waste streams accumulated in an area from different points of generation.

USE AND MANAGEMENT OF CONTAINERS IN <90 DAY ACCUMULATION AREAS

45.	Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
46.	Is the accumulation date on each container? [3745-52-34(A)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
47.	Are hazardous wastes stored in containers which are:	
a.	Closed (except when adding/removing wastes)? [3745-66-73(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	In good condition? [3745-66-71]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Compatible with wastes stored in them? [3745-66-72]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	Handled in a manner which prevents rupture/leakage? [3745-66-73(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

NOTE: Record location on process summary sheets, photograph the area, and record on facility map.

48.	Is the container accumulation areas(s) inspected weekly? [3745-66-74] Per ORC§1.44(A) "Week" means 7 consecutive days.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	Are inspections recorded in a log or summary? [3745-66-74]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
49.	Are containers of ignitable or reactive wastes located at least 50 feet (15 meters) from the facility's property line? [3745-66-76]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
50.	Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
51.	If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B)? [3745-66-77(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
52.	If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B)? [3745-66-77(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

NOTE: OAC 3745-65-17(B) requires that the generator treat, store, or dispose of ignitable or reactive waste, and the mixture or commingling of incompatible wastes, or incompatible wastes and materials so that it does not create undesirable conditions or threaten human health or the environment.

53.	If the generator has closed a <90 day accumulation area does the closure appear to have met the closure performance standard of 3745- 66-11? [3745-52-34(A)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
-----	---	--

NOTE: Please provide a description of the unit and documentation provided by the generator for the file to demonstrate that closure was completed in accordance with the closure performance standards. If the generator has closed a <90 day tank, closure must also be completed in accordance with OAC 3745-66-97 (except for paragraph C of this rule). [3745-52-34]

PRE-TRANSPORT REQUIREMENTS

54.	Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
55.	Does each container ≤119 gallons have a completed hazardous waste label? [3745-52-32(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

[Facility Name/Inspection Date]
[ID number]
LQG/August 2009
Page 5 of 6

56.	Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
-----	---	---	-----------------------------	------------------------------

SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS – BATTERIES AND LAMPS		
Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more		
Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg or less		
PROHIBITIONS		
1.	Did the SQUWH dispose of universal waste? [3745-273-11(A)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
2.	Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in OAC rule 3745-273-17 or managing specific wastes as provided in OAC rule 3745-273-13? [3745-273-11(B)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
WASTE MANAGEMENT AND LABELING/MARKING		
UNIVERSAL WASTE BATTERIES		
3.	Are batteries that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
4.	If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
5.	Are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
6.	If the electrolyte is removed or other wastes generated, has it been determined whether the electrolyte or other wastes exhibit a characteristic of hazardous waste? [3745-273-13(A)(3)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
a.	If the electrolyte or other waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? [3745-273-13(A)(3)(a)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
7.	Are the batteries or containers of batteries labeled with the words "Universal Waste - Batteries" or "Waste Battery(ies)" or "Used Battery(ies)"? [3745-273-14(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
UNIVERSAL WASTE LAMPS		
8.	Does the SQUWH contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(D)(1)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
9.	Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage, spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: Treatment (such as crushing) by a UWH is prohibited under this rule unless the facility is permitted for such activities [3745-273-31(B)]. A generator crushing lamps must manage lamps according to hazardous waste rules (OAC Chapter 3745-52). Lamp crushing is a form of generator treatment (OAC rule 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility using a hazardous waste manifest.		
10.	Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)"? [3745-273-14(E)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>

ACCUMULATION TIME		
11.	Is the waste accumulated for less than one year? [3745-273-15(A)] <i>last shipment - 4/29/11</i>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	If not, is the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate) [3745-273-15(B)] (this change makes it like the LQUWH checklist)	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>
NOTE: Accumulation is defined as date generated or date received from another handler.		
12.	Is the handler able to demonstrate the length of time the universal waste has been accumulated? [3745-273-15(C)] If yes, describe below: <i>8:14 hrs to USA Imp. H&S, HI 4/29/11</i>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
EMPLOYEE TRAINING		
13.	Are employees who handle or have the responsibility for managing universal waste informed of waste handling/emergency procedures, relative to their responsibilities? [3745-273-16] <i>see below</i>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
RESPONSE TO RELEASES		
14.	Are releases of universal waste and other residues immediately contained? [3745-273-17(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
15.	Is the material released characterized? [3745-273-17(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
16.	If the material released is a hazardous waste, was it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to OAC Chapter 3745-52) [3745-273-17(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
OFF-SITE SHIPMENTS		
NOTE: If a SQUWH self-transport waste, then the handler must comply with the Universal Waste transporter requirements.		
17.	Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
18.	Is the handler aware of DOT requirements for packaging and shipping? If no, make aware of 49 CFR 171-180.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
19.	Prior to shipping universal waste off-site, does the originating handler ensure that the receiver agrees to receive the shipment? [3745-273-18(D)] (this change makes it like the LQUWH checklist)	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
20.	Has the originating handler ever had an off-site shipment rejected by another handler or destination facility?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	If yes, did the originating handler receive the waste back or agree to where the shipment was sent? [3745-273-18(E)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
21.	If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss and do <u>one</u> of the following:	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
a.	Send the waste back to the originating handler or send the shipment to a destination facility (If both the originating and receiving handler agree)? [3745-273-18(F)(2)] (this change makes it like the LQUWH checklist)	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
22.	If the handler received a shipment of hazardous waste that was not a universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

EXPORTS			
23.	Is waste being sent to a foreign destination? If so:		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	a.	Does the small quantity handler comply with primary exporter requirements in OAC rules 3745-52-53, 3745-52-56, and 3745-52-57? [3745-273-20(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	b.	Is waste exported only upon consent of the receiving country and in conformance with the U.S. EPA "Acknowledgment of Consent" as defined in OAC rules 3745-52-50 to 3745-52-57? [3745-273-20(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	c.	Is a copy of the U.S. EPA "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

**USED OIL INSPECTION CHECKLIST
GENERATORS, COLLECTION CENTERS AND AGGREGATION POINTS**

NOTE: A facility is subject to the federal SPCC regulations (40 CFR 112) if it is non-transportation related (e.g., fixed) and has an aggregate above ground storage capacity greater than 1,320 gallons or a total underground storage capacity greater than 42,000 gallons of oil (including used oil), and there is reasonable expectation of a discharge to navigable waters.

PROHIBITIONS

1.	Does the generator manage used oil in a surface impoundment or waste pile? If yes:	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
a.	Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

NOTE: For example, used oil contaminated scrap metal stored in a pile.

2.	Is used oil used as a dust suppressant? [3745-279-12(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
3.	Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>

NOTE: Multiple used oil checklists may be applicable if used oil handler is performing multiple tasks (e.g., if generating used oil and shipping directly to a burner, complete generator and marketer checklists at a minimum).

GENERATOR STANDARDS

4.	Does the generator mix hazardous waste with used oil? If so,	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
a.	Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

NOTE: Used Oil mixed with listed (3745-51-30 to 3745-51-35) or characteristic (3745-51-20 to 3745-51-24) hazardous waste are subject to regulation as a hazardous waste, unless the listed hazardous waste is listed solely because it exhibits a hazardous characteristic, and the resultant mixtures do not exhibit a characteristic. Mixtures of used oil and CESQG hazardous waste are subject to OAC Chapter 3745-279.

5.	Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
----	--	------------------------------	-----------------------------	---

NOTE: If used oil contains greater than 1000 ppm total halogens, it is presumed to be listed hazardous waste until the presumption is successfully rebutted.

6.	Does the generator store used oil in tanks; or containers; or a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-22(A)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
7.	Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
8.	Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
9.	Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
a.	Stopped the release?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
b.	Contained the release?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
c.	Cleaned up and properly managed the used oil and other materials?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
d.	Repaired or replaced the containers or tanks prior to returning them to service, if necessary?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

ON-SITE BURNING IN SPACE HEATER

10.	Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so:			
a.	Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>

[Facility Name/Inspection Date]

[ID Number]

Used Oil Checklist for Generators/June 2008

Page 1 of 2

b.	Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
c.	Are the combustion gases from heater vented to the ambient air?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

NOTE: Ash accumulated in a space heater must be managed in accordance with 3745-279-10(E).

GENERATOR TRANSPORTATION

11.	Does the generator have the used oil hauled only by transporters that have obtained a U.S. EPA ID#? [3745-279-24] <i>Safon-Klean, Wheeling, W.V.</i>	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
12.	If the generator self-transported used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24]			
a.	Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator? [3745-279-24]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
b.	Does the generator transport more than 55 gallons of used oil at any time? [3745-279-24]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

NOTE: Used oil generators may arrange for used oil to be transported by a transporter without a U.S. EPA ID # if the used oil is reclaimed under a contractual agreement (i.e., tolling arrangement).

COLLECTION CENTERS AND AGGREGATION POINTS

13.	Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
14.	Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
15.	Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

NOTE: Complete Used Oil Generator and any other applicable used oil handler checklist (e.g., marketer, burner, etc.) for used oil collection centers and aggregation points.

LQG TANK SYSTEM REQUIREMENTS (OAC rule 3745-52-34(A) and OAC rules 3745-66-90 through 3745-66-100)			
1.	Is each tank clearly labeled/marked with the words "Hazardous Waste?" [3745-52-34(A)(3)]		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
TANK SYSTEM – GENERAL OPERATING REQUIREMENTS			
2.	Does the o/o follow the general operating requirements below:		
a.	Does the o/o prevent placement of hazardous waste or treatment reagents in tank or secondary containment if such placement can cause the system to leak, rupture, corrode, or otherwise fail? [3745-66-94(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
b.	Does the o/o use appropriate controls to prevent spills or overflows from the system (e.g., check valves, dry disconnect couplings, high level alarms, etc.)? [3745-66-94(B)] <i>0.002 - 0.001 / 10m - 0.001</i>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
c.	If a leak or spill has occurred in the tank system, has the o/o complied with 3745-66-96? [3745-66-94(C)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
TANK SYSTEM – INSPECTION REQUIREMENTS			
3.	Has the o/o documented the inspections required in 3745-66-95, in the operating record, including inspection of the following:		
a.	Spill control equipment each operating day? [3745-66-95(A)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
b.	Above ground portion of tank each operating day? [3745-66-95(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
c.	Data from leak detection equipment each operating day? [3745-66-95(A)(3)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
d.	Construction materials and area immediately surrounding the tanks for signs of erosion or release of hazardous waste each operating day? [3745-66-95(A)(4)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
NOTE: "Each operating day" is each day that the tank system is being used to manage (store or treat) hazardous waste.			
4.	Where applicable, the cathodic protection system to confirm proper operation within six months of initial installation and annually thereafter? [3745-66-95(B)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
5.	Where applicable, all sources of impressed current at least bi-monthly? [3745-66-95(B)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
TANK SYSTEM CLOSURE REQUIREMENTS			
6.	If the generator has closed a <90 day tank, was closure completed in accordance with 3745-66-97 (except for paragraph C)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
TANK SYSTEMS STORING IGNITABLE OR REACTIVE WASTES			
7.	For tanks used to treat or store ignitable or reactive wastes, has the o/o complied with one of the following: [3745-66-98(A)]		Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
a.	Is the waste treated before or immediately after placement in the tank so that the resultant mixture is no longer ignitable or reactive and the o/o has conducted such activities in compliance with 3745-66-17(B)? [3745-66-98(A)]; or	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
b.	Is the waste stored or treated to protect it from materials or conditions which may cause ignition or reaction? [3745-66-98(A)]; or	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
c.	The tank is used solely for emergencies? [3745-66-98(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
8.	If ignitable or reactive waste is stored or treated, are protective distances maintained between waste management areas and any public streets, alleys or adjoining property lines as required by the NFPA Flammable and Combustible Liquids Code (1996)? [3745-66-98(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
9.	Has the o/o placed incompatible wastes or materials into the same tank system, or into a tank system that has not been decontaminated and which previously held an incompatible waste or material? [3745-66-99(A) and/or (B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	

[Facility Name/Inspection Date]

[ID number]

LQG TANK /November 2009

Page 1 of 5

	a.	If so, have the requirements of 3745-65-17(B) been met? [3745-66-99(A) and/or (B)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input checked="" type="checkbox"/>
TANK SYSTEM – WASTE ANALYSIS REQUIREMENTS					
10.		In addition to conducting the waste analysis required by 3745-65-13, when the tank system is used to store or treat a waste which is substantially different or uses a substantially different process than previously used, has the o/o done one of the following: [3745-66-100]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
	a.	Conducted waste analysis and trial treatment or storage tests? [3745-66-100(A)]; OR	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
	b.	Obtained written documentation on similar waste under similar operating conditions to show that the proposed storage/treatment will meet the requirements of 3745-66-94? [3745-66-100(B)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
TANK SYSTEMS REQUIREMENTS					
11.		Is there a written assessment attesting that the design, installation and structural integrity of the system is adequate for the management of hazardous waste(s)? [3745-66-92(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
<i>NOTE: You should review the file to see if the written assessment has been previously reviewed and what the results were.</i>					
12.		Does the written assessment include the following: [3745-66-92(A)]			
	a.	Certification by an independent, registered professional engineer? [3745-66-92(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	b.	Consideration of the design standards of the system? [3745-66-92(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	c.	Consideration of the hazardous characteristics of the waste(s)? [3745-66-92(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	d.	An evaluation by a corrosion expert (only if the external system/components are metal and in contact with soil or water)? [3745-66-92(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	e.	A determination of design and operational measures that will be needed to protect the tank system from potential damage (only for underground tank components)? [3745-66-92(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	f.	Design considerations to ensure that the tank foundations will maintain the load of a full tank? [3745-66-92(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	g.	Design considerations for anchoring the unit to prevent floatation (only for tanks situated in a seismic fault zone or saturated zone)? [3745-66-92(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	h.	Design considerations to ensure that the tank system will withstand the effects of frost heave (only for underground tank systems)? [3745-66-92(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
<i>NOTE: CO-DHWM Engineering staff are available to assist you with evaluation of the written assessment.</i>					
13.		Are there written statements by those persons who supervised installation or certified design of the new tank system, that the tank system was properly installed and designed and that required repairs were performed? [3745-66-92(G)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
		Do the written statements address all of the following:			
	a.	Inspection for damage and/or inadequate construction and installation was conducted? [3745-66-92(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	b.	Statement that deficiencies were corrected before the tank system was covered or put into use? [3745-66-92(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	c.	Proper backfilling? [3745-66-92(C)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	d.	Tightness test; if the tank system was found not to be tight, does the statement indicate that proper repairs were made? [3745-66-92(D)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

e.	Proper support and protection of ancillary equipment? [3745-66-92(E)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
f.	Supervision of the installation of field fabricated corrosion protection? [3745-66-92(F)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
SECONDARY CONTAINMENT				
14.	Has secondary containment been provided? [3745-66-93(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
NOTE: All tank systems must have secondary containment at this point, except for tank systems that store/treat materials that become hazardous waste after January 12, 1987, which must have secondary containment required within the time intervals in 3745-66-93(A)(1) to (A)(4). The date the material became a hazardous waste must be used in place of January 12, 1987. [3745-66-93(A)(5)]				
15.	Is secondary containment one of the following:	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
a.	An External Liner ? [3745-66-93(E)(1)] If so,	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
i.	Is liner designed or operated to contain 100% of the capacity of the largest tank?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
ii.	Is liner designed and operated to prevent run-on and infiltration or the collection system has excess capacity to contain run-on and infiltration from a 25-year, 24-hour storm?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
iii.	Is liner free of cracks and gaps?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
iv.	Does liner completely surround the tank and cover all earth likely to be contacted by waste during a release?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
v.	Are chemically resistant water stops in place at all points? (concrete liners only)	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
vi.	Is there a compatible interior coating or lining to prevent migration of waste into the concrete? (concrete liners only)	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
b.	Vault System ? [3745-66-93(E)(2)] If so,	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
i.	Is vault system designed to contain 100% of the capacity of the largest tank?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
ii.	Is liner designed and operated to prevent run-on and infiltration or the collection system has excess capacity to contain run-on and infiltration from a 25-year, 24-hour storm?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
iii.	Are chemically resistant water stops in place at all points?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
iv.	Is there a compatible interior coating to prevent migration into the concrete?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
v.	For ignitable or reactive waste: Is the vault system provided with means to prevent (or alternatively "protect against") the formation or ignition of vapors?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
vi.	Is vault system provided with an exterior moisture barrier?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
c.	Double-Walled Tank ? [3745-66-93(E)(3)] If so,	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
i.	Is double-walled tank designed as an integral structure to contain any release from the inner tank?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
ii.	If metal, are the primary tank interior and outer shell exterior surfaces protected from corrosion?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
iii.	Is double-walled tank provided with a continuous leak detection system able to detect a release within 24 hours or at the earliest practicable time?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

d.	An Equivalent Device? As described in 3745-66-93(D)(4) which has been approved by the director? [3745-66-93(D&E)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	<input checked="" type="checkbox"/>
SECONDARY CONTAINMENT DESIGN/OPERATION/INSTALLATION					
16.	Has each secondary containment system been designed, installed and operated to prevent <u>any</u> migration of wastes or liquid to the soil, groundwater, or surface water and is it capable of <u>detecting</u> and <u>collecting</u> releases and accumulated liquids? [3745-66-93(B)(1)&(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	<input type="checkbox"/>
17.	Does the secondary containment system meet the following minimum requirements of [3745-66-93(C)]:				
a.	Constructed or lined with compatible materials of sufficient strength to prevent failure? [3745-66-93(C)(1)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	<input type="checkbox"/>
b.	Placed on a foundation or base capable of providing support? [3745-66-93(C)(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	<input type="checkbox"/>
c.	Provided with a leak detection system designed/operated to detect failure to primary or secondary containment or any release of hazardous waste within 24 hours or at the earliest practicable time? [3745-66-93(C)(3)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	<input type="checkbox"/>
d.	Sloped or designed to drain and remove liquid resulting from leaks, spills or precipitation? [3745-66-93(C)(4)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	<input type="checkbox"/>
e.	Any liquid which accumulates in the containment unit resulting from spills, leaks or precipitation removed within 24 hours or in a timely manner? [3745-66-93(C)(4)] <i>RAW NYS Agem</i>	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	<input type="checkbox"/>
ANCILLARY EQUIPMENT REQUIREMENTS					
18.	Is ancillary equipment provided with secondary containment (such as double-walled piping, jacketing or a trench)?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	<input type="checkbox"/>
	If not , is the ancillary equipment one of the following: [3745-66-93(F)]				
a.	Above ground piping (exclusive of flanges, joints, valves and connections) that is inspected daily?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	<input type="checkbox"/>
b.	Welded flanges, welded joints and/or welded connections that are inspected daily?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	<input type="checkbox"/>
c.	Sealless or magnetic coupling pumps and/or sealless valves that are inspected daily?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	<input type="checkbox"/>
d.	Pressurized above ground piping systems with automatic shut-off devices (e.g., excess flow check valves, flow metering shutdown and/or loss of pressure-actuated shut-off devices) that are inspected daily?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	<input type="checkbox"/>
TANK SYSTEMS FOUND TO BE LEAKING OR UNFIT FOR USE					
19.	Has there been a leak or spill from any tank system or has any tank system been found unfit for use? If so , did the o/o:	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>	<input type="checkbox"/>
NOTE: If the tank is found to be unfit for use, inspector should explain why.					
a.	Immediately cease flow of material into tank and investigate the cause of the release? [3745-66-96(A)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	<input checked="" type="checkbox"/>
b.	Remove waste from tank system to prevent further release within 24 hours of detection or the earliest practicable time? [3745-66-96(B)(1)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	<input checked="" type="checkbox"/>
c.	Remove all material released into secondary containment system within 24 hours or as timely as possible to prevent harm to human health and the environment? [3745-66-96(B)(2)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	<input checked="" type="checkbox"/>
d.	For a visible release to the environment, immediately conduct a visual inspection of the release? [3745-66-96(C)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	<input checked="" type="checkbox"/>
e.	For a visible release to the environment, prevent further migration of the leak or spill to soils or surface waters? [3745-66-96(C)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	<input checked="" type="checkbox"/>
f.	For a visible release to the environment, properly dispose of any visibly contaminated soil or surface water? [3745-66-96(C)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>	<input checked="" type="checkbox"/>

[Facility Name/Inspection Date]

[ID number]

LQG TANK /November 2009

Page 4 of 5

	g.	Report any release to the environment to the director within 24 hours unless it was less than one pound and was cleaned up immediately? [3745-66-96(D)(1)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
	h.	For a release to the environment, submit a written report of the incident to the director within 30 days of the release? [3745-66-96(D)(3)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
	i.	Remediate the spill and repair the unit prior to returning it to service? [3745-66-96(E)(2)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
	j.	For a release from a tank system without secondary containment, did the o/o provide secondary containment meeting the requirements of 3745-66-93 for the unit prior to putting it back into service? [3745-66-96(E)(4)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
NOTE: The requirements noted in 19.j. do not apply if the release was from an above ground component of the tank which can be inspected visually after being put back into service.					
20.		In the event that the repairs to the tank system were major (e.g., replacement of liner, repair of ruptured primary or secondary containment structure), did the o/o obtain a certification from an independent, registered P.E. attesting that the repaired unit is capable of handling hazardous waste? [3745-66-96(F)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
21.		Was a copy of the certification submitted to the director within seven days after returning the system to use? [3745-66-96(F)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
22.		If the o/o was unable to repair and return the unit to service as described in 19.i through 19.j, was the tank system closed in accordance with 3745-66-97? [3745-66-96(E)(1)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
23.		Does the o/o have a tank system with a variance from secondary containment from which a release has occurred but <u>has not</u> migrated beyond the zone of engineering control? If so,	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	a.	Has the o/o complied with 3745-66-96(A) through (F) and decontaminated soils? [3745-66-93(G)(3)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
	b.	If soils cannot be decontaminated/removed, has the o/o complied with 3745-66-97(B)? [3745-66-93(G)(3)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
24.		Does the o/o have a tank system with a variance from secondary containment from which a release occurred and <u>has</u> migrated from the zone of engineering control? If so,	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	a.	Has the o/o complied with 3745-66-96(A) through (D), prevented migration, and decontaminated soil? [3745-66-93(G)(4)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
	b.	If soils cannot be decontaminated/removed, or if the groundwater has been contaminated, has the o/o complied with 3745-66-97(B)? [3745-66-93(G)(4)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>

[Facility Name/Inspection Date]

[ID number]

LQG TANK /November 2009

Page 5 of 5

Inspection Checklist for Subpart CC: Air Emission Standards (Containers)

Item # 40 CFR:

CC-1	265.1080	Do any of the following exclusions apply? If yes, please circle.	YES	NO
<p>Applicability: The air emission requirements apply to units subject to subpart I * unless the following apply (circle if applicable):</p> <ol style="list-style-type: none"> 1. Waste was placed in unit prior to Oct. 6, 1996, and none has been added since. 2. The container capacity is less than .1 cubic meter (26 gallons) 3. A unit (e.g. tank) has stopped adding waste and is undergoing closure 4. The unit is used solely for onsite treatment or storage as a result of remedial activities required under corrective action, Superfund, or other similar state program 5. The unit is used solely to manage radioactive mixed waste 6. The unit is regulated by and operates in accordance with Clean Air Act regulations <p>*Note: 1. Satellite containers are exempt 2. CESQG's and SQG's are exempt</p>				
CC-2	265.1083	Do any of the following exemptions apply? If yes, please circle	YES	NO
<p>General Standards: The owner/operator must control air emissions from waste management units except the unit is exempt if (please circle if applicable):</p> <ol style="list-style-type: none"> 1. All hazardous waste entering the unit has an average VO concentration at the point of origination less than 500 parts per million by weight (waste determination required) 2. The organic content of all waste entering the unit has been reduced by one of the 8 acceptable destruction or removal processes. 3. The unit is a tank used for certain biological treatment 4. The hazardous waste placed in the unit meets the LDR numerical concentration limits or has been treated using the specified LDR treatment technology (for organics) 5. The unit is a tank used for bulk feed to an incinerator and meets certain requirements 				
CC-3	265.1084	Waste Determination:	Determination Not Needed	Determination Needed
<p>Was the VO concentration properly determined for each waste which the facility manages in a unit which does not meet Subpart CC requirements? The concentration must be determined by either direct measurement or knowledge. Please see 265.1084 for specific requirements for measurement and knowledge. Determination is <u>not</u> needed for waste managed in containers which meet standards. It may be necessary to evaluate container management prior to requiring VO concentration determination.</p>				

#	NA=Not Applicable, NI=Not Inspected, OK= In Compliance, DF= Deficiency	NA	NI	OK	DF
CONTAINER MANAGEMENT 265.1087					
	Level 1	Level 2	Level 3		
	Larger than 26.4 gallons and less than or equal to 122 gallons, or larger than 122 gallons and do not manage H.W. in light material service	Larger than 122 gallons and manage H.W. "in light material service" (definition at 265.1081)	Larger than 26.4 gallons and treat H.W. by a stabilization process		
CC-4	265.1087	Controls		OK	
<p>One of the following:</p> <ul style="list-style-type: none"> -Use containers that meet DOT requirements -Use a cover and control with no visible gaps, holes or other open spaces into the interior of the container -Use organic vapor suppression on or above the container <p>265.1087(c)</p>		<p>One of the following:</p> <ul style="list-style-type: none"> -Use containers that meet DOT requirements -Use containers that operate with no detectable emissions (method 21) -Use containers that are demonstrated to be vapor-tight within the last 12 months (method 27) <p>265.1087(d)</p>	<ul style="list-style-type: none"> -Containers used to stabilize H.W. with volatile organics greater than 500 ppm -For waste stabilized in a container either: <ol style="list-style-type: none"> 1. container must be vented directly to a control device; or 2. container is vented inside an enclosure which is exhausted through a closed vent to a control device -Conservation vents are not allowed <p>265.1087(b)(2)</p>		

Level 1		Level 2		Level 3	
#	NA=Not Applicable, NI=Not Inspected, OK= In Compliance, DF= Deficiency	NA	NI	OK	DF
CC-5	265.1087	Waste transfer requirements			
No waste transfer requirements apply (K)		-Waste transfer requirements apply regardless of container alternative used in level 2 -Transfer waste into or out of a container in such a manner as to minimize exposure of the waste to the atmosphere. Acceptable methods include a submerged fill pipe, vapor recovery system, or fitted opening with a line purge 265.1087(b)(3)		Not applicable	
CC-6	265.1087	Operating requirements			(OK)
The covers, openings, and closure devices should be closed except: 1. When transferring H.W. in and out of the containers 2. between batch transfer not exceeding 15 minutes between transfer (note: if the person performing the transfer leaves the area, or the process shuts down, the container must be closed) 3. While performing sampling and equipment access 4. Conservation and safety vents are allowed -Containers may be open while performing sampling or equipment access -Safety valves and conservation vents may be used if normally left in close position -A cover need not to be on a RCRA empty container, as defined in 40 CFR 261.7 265.1087(c)(3), (d)(3)		-If the vapors are directly vented to a control device, there are specific design and operating criteria that must be met same as tanks that have closed vent and control device systems -If an enclosure is used, the enclosure must meet the design and operating criteria specified in "Procedure T-Criteria for and Verification of a Permanent or Temporary Total Enclosure" under 40 CFR 52.741 The container, enclosure, control device or closed vent system may have safety relief devices.			
CC-7	265.1089	Inspection requirements			(OK)
Minimal inspection required: - when facility accepts container and it is not emptied within 24 hours -if wastes are stored greater than a year, then visually inspect once a year If inspections are required, facility must develop written plan and schedule to perform inspection 265.1087(c)(4), (d)(4)		Inspection requirements are the same as for tanks			
CC-8	265.1087	Repair requirements			(OK)
When a defect is detected; attempt to repair within 24 hours must be made and: 1. Repair within 5 calendar days or empty and remove the container from service 2. Do not use until defect is repaired 265.1087(c)(4), (d)(4)		Necessary corrective measures shall be <u>immediately</u> implemented to ensure that the control device is operated in compliance			
CC-9	265.1090	Recordkeeping requirements			
-If (K)	Since Level 2 waste is "in light material service", no records need to be kept	Depends upon how the organic emissions are vented: -If an enclosure is used, records must be maintained for the most recent set of calculations and measurements performed to verify that the enclosure meets the criteria of a permanent total enclosure (Procedure T) -Records for the closed vent and control device system are the same for those used on tanks(265.1090)(e)			

Comments:

* NO PAWT waste in 250 day after.



Photograph #1 – Plate Pickling Operation Tank Farm, 18,000 Gallon Titanium Fluoride Hazardous Waste Tank



Photograph #2 – Plate Pickling Operation Tank Farm, Secondary Containment



Photograph #3 – Coil Department/Strip Mill Tank Farm, HF Hazardous Waste Tank



Photograph #4 – Sheet Finishing Area, 6,000 Gallon HF Hazardous Waste Tank



Photograph #5 – Maintenance Shop, Universal Waste Lamp Accumulation Area

PRC Environmental Management, Inc.
1505 PRC Drive
McLean, VA 22102
703-883-8880
Fax 703-556-2852

RECEIVED
APR 28 1992
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

PRC

RECEIVED
WASTE RECORD CENTER

SEP 11 1993

April 22, 1992

Mr. Harry L. Turic
Manager of Engineering
Titanium Metals Corporation
100 Titanium Way
Toronto, OH 43964

Subject: Request for additional information regarding the Titanium Metals Corporation (Timet) facility, Toronto, Ohio

Dear Mr. Turic:

This letter is a followup to our April 21, 1992 telephone conversation regarding PRC's request for additional information on your facility. Some general questions regarding your facility are listed below:

- What is your facility's latitude and longitude?
- What is the name of the landfill to which you send your facility's trash and baghouse blower dust?
- Five acid spills were reported by the Ohio Environmental Protection Agency (OEPA) between 1981 and 1983. Can you please indicate which units released the spilled material?
- Are on-site wells currently in use for any purposes? When were the on-site wells closed?
- EPA's files indicate that your facility's RCRA Part A permit application was withdrawn. When was this done? Can you produce a copy of the original RCRA Part A permit application?

In addition to the general questions presented above, there are some specific data gaps regarding the solid waste management units (SWMU) identified during our site inspection. The SWMUs have been marked on the attached facility layout.

- **Drum Storage Area 1:** What are the dimensions of this unit and what is its maximum capacity? When did the unit begin operation? Where are wastes stored in this unit disposed of? Approximately how many drums are stored routinely in this unit?
- **Drum Storage Area 2:** What are the dimensions of this unit and what is its maximum capacity? When did the unit begin operation? Where are wastes stored in this unit disposed of? Approximately how many drums of waste oil and scrap titanium are routinely stored in this unit? How many steel bins of titanium swarf are stored in this unit?
- **Active Acid Storage Area 1:** What is the capacity of each of the three tanks in this unit? What are the tanks and secondary containment constructed of? What are the dimensions of the secondary containment? When did the unit begin operations? Have there been any reportable releases from this unit?

Mr. Harry L. Turic
April 22, 1992
page 2

- **Active Acid Storage Area 2:** What is the capacity of each of the four tanks in this unit? What are the tanks and secondary containment constructed of? What are the dimensions of the secondary containment? When did the unit begin operations? Have there been any reportable releases from this unit?
- **Former Acid Storage Area 1:** What is the capacity of each of the two tanks in this unit? What are the tanks and secondary containment constructed of? What are the dimensions of the secondary containment? When did the unit begin operations? When is this unit scheduled to be decommissioned? Have there been any reportable releases from this unit?
- **Former Acid Storage Area 2:** What is the capacity of each of the four tanks in this unit? What are the tanks and secondary containment constructed of? What are the dimensions of the secondary containment? When did the unit begin operations? When is this unit scheduled to be decommissioned? Have there been any reportable releases from this unit?
- **Former Drum Storage Area:** What were the dimensions and capacity of this unit? When did the unit begin operations? A drain was noted during PRC's site inspection near the vicinity of this former unit. Where does this drain lead?

I appreciate your cooperation and assistance in compiling this information. We will appreciate your prompt response to our request. Feel free to fax a response or call me at (703) 883-8888 at your earliest convenience. Thank you for your help.

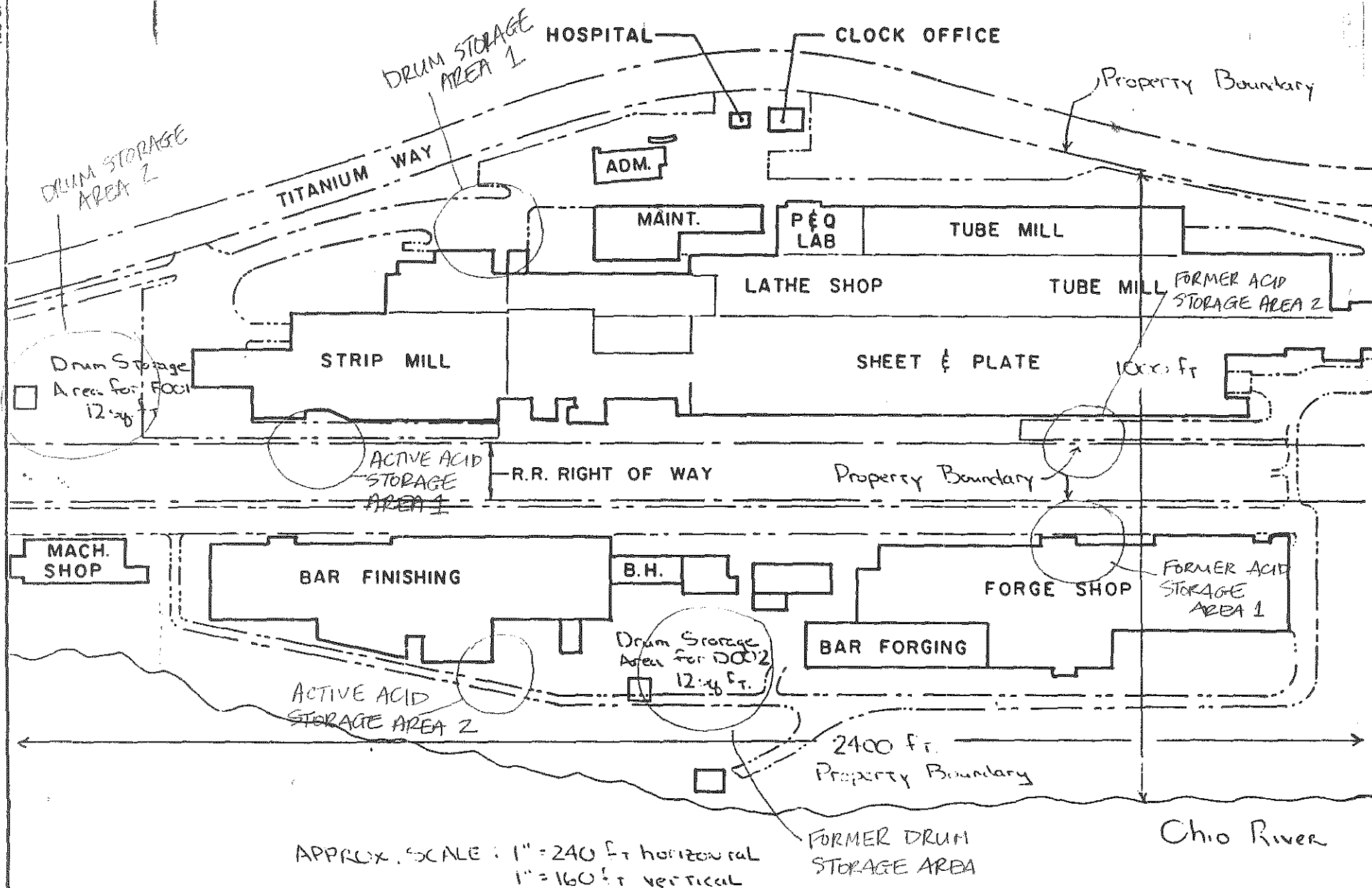
Sincerely,



Sherry M. Gernhofer
Environmental Scientist

enclosure

cc: Paul Wooldridge, PRC
Shin Ahn, PRC
Kevin Pierard, EPA Region V



APPROX. SCALE : 1" = 240 Ft horizontal
1" = 160 Ft vertical



Re: Jefferson County
Titanium Metals
Hazardous Materials
#04-41-0565

04D 098435 134

Titanium Metals Corporation
Timet Division
100 Titanium Way
Toronto, Ohio 43964

May 11, 1983

Attention: Mr. Hiram Cotton

Dear Sir:

On May 5, 1983, Ohio EPA inspected your facility to determine compliance with State and Federal hazardous waste regulations. Mr. Thad Kucherawy represented Timet. At the time of inspection, the following problem areas were noted:

1. Permit Withdrawal - After receiving a request from USEPA for submittal of a Part B facility application, Timet requested their permit be withdrawn. To date, this withdrawal request has not been certified by HWFAB. Therefore, Timet is still considered by Ohio EPA to be an active, permitted facility and subject to facility standards and requirements until such time as you are notified in writing, that your permit is no longer in effect.
2. Generator Requirements - Note was made that drums of F001 were not marked 'Hazardous Waste' and labelled with the date of accumulation. This will be required when Timet is no longer a permitted facility.
3. Inspection Plan - The plan was not being followed, inspections were not being documented, no operating log was being kept.
4. Operating Record - The facility had not been keeping the required operating record.
5. Financial Responsibility - Liability insurance has not been obtained for the facility.
6. Personnel Training - The annual training refresher course is needed. Mr. Kucherawy was not properly trained and instructed in hazardous waste management practices and regulations by his supervisor when he assumed his new duties. This appears to be the primary cause of the problems outlined in this letter, since the required logs and records were not being kept, and inspections were not being done, prior to the time Timet requested the permit withdrawal.

Titanium Metals Corporation

May 11, 1983

Page 2

A copy of the completed inspection form is enclosed, please call if there are any questions. Facility operations should begin to conform to the requirements at once, and continue until the permit withdrawal problem is resolved. Please notify this office within 30 days of the date of this letter as to your corrective actions for the deficiencies found during the inspection. For questions about your permit, please contact:

Mr. Tom Crepeau
614-466-1586

Sincerely,



Michael Moschell

Inspector

Division of Hazardous Materials Management

MM:dm

cc: Paula Cotter, DHMM, C.O.

cc: USEPA, Region V

5/183 10:30am
Date and Time of Inspection

RCRA INTERIM STATUS INSPECTION FORM

HWFAB #04-41-0565

PART 1. GENERAL INFORMATION

U.S. EPA I.D. # OH D098435134

Facility: TITANIUM METALS Address: 100 TITANIUM WAY City: TORONTO
State: OHIO Zip Code: 43964 County: JEFFERSON Telephone: 614-537-1571

INSPECTION PARTICIPANTS(S)

(Name)	(Title)	(Telephone)
1. <u>THOMAS KUCHERAWY</u>	<u>ENV. ENGR.</u>	<u>537-1571</u>
2. _____	_____	_____
3. _____	_____	_____

INSPECTOR(S)

1. <u>MIKE MOSCHELL</u>	<u>INSP.</u>	<u>385-8501</u>
2. _____	_____	_____
3. _____	_____	_____

INSTALLATION ACTIVITY

Mark One

- ☐ Generator only (G)
- ☐ Transporter (T)
- ☐ TSDF only
- ☐ G-T
- ☒ G-TSDF
- ☐ T-TSDF
- ☐ G-T-TSDF

If the site is a TSDF, check the boxes indicating which regulations are applicable.

- | | |
|--|---|
| <input checked="" type="checkbox"/> General Facility Standards, Preparedness and Prevention, Contingency and Emergency, Manifests/Records/Reporting, Closure | <input type="checkbox"/> Waste Piles S03 |
| <input checked="" type="checkbox"/> Containers S01 | <input type="checkbox"/> Land Treatment D81 |
| <input type="checkbox"/> Tanks S02/T01 | <input type="checkbox"/> Landfills D80 |
| <input type="checkbox"/> Surface Impoundments S04/T02 | <input type="checkbox"/> Chemical/Physical/Biological T04 |
| <input type="checkbox"/> Incineration/Thermal Treatment | <input type="checkbox"/> Groundwater Monitoring |
| | <input type="checkbox"/> Post-Closure |

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Has the facility submitted a Part A to Ohio?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. If "yes", is it complete and accurate?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	#1
3. Has the facility submitted a Part B?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	#2

REMARKS, PART 1. GENERAL INFORMATION

Include a brief description of site activity and waste handling.

#1 Facility Requested Permit Withdrawal From HWEAB 1-5-83

#2 PART B called in; Facility then Requested Permit Withdrawal
From Feds 11-29-82

Rolling, Forging, Pickling of TITANIUM

WASTES - FOOL - TRICHLOROETHANE

KO62 - SPENT (NITRIC, SULFURIC, HYDROFLUORIC ACIDS) PICKLING
LIQUORS

DOOZ - CAUSTIC KOLONE

RCRA INTERIM STATUS INSPECTION FORM

PART 2. GENERATOR REQUIREMENTS

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Section 261 and in compliance with the requirements of Sections 262.11.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Does this facility generate any hazardous wastes that are excluded from regulation under Section 261.4 (statutory exclusions) or Section 261.6 (recycle/reuse)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Section 265.1(c)(9)) or via operation of an elementary neutralization unit and/or wastewater treatment unit (Section 265.1(c)(10)).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Section 262.21(a) and (b) and the minimum number of copies required by Section 262.22.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Section 262.20.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Section 262.23.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Section 262.42(a), (b)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Section 262.40.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
5. The generator meets the following hazardous waste pre-transport requirements:				
a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Section 262.30, 262.31 and 262.32(a))	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 liters) <u>or less</u> is affixed with a completed hazardous waste label as required by Section 262.32(b).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Section 262.33.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Section 262.50.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
7. If the generator elects to store hazardous waste on-site in <u>containers</u> or <u>tanks</u> for <u>90 days</u> or less without a RCRA storage permit as provided under Section 262.34, the following requirements with respect to such storage are met:				
a) The containers are clearly marked with the words "Hazardous Waste".	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Permitted Storage
b) The date that accumulation began is clearly marked on each container.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
8. The generator has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course (Section 262.34).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Need Annual Refresher
9. The generator keeps all of the records required by Section 265.16(d)(e) including written job titles, job descriptions and documented employee training records (Section 262.34).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

RCRA INTERIM STATUS INSPECTION FORM

NOTE : SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265, SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND CERTAIN PORTIONS OF THE "CONTAINERS" AND "TANKS" RULES BE MET. COMPLETE THE APPROPRIATE SECTIONS OF THE INSPECTION FORM.

REMARKS, PART 2. GENERATOR REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
5. The facility has a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary. (265.14(c))	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. a) The operator must develop and follow a comprehensive, written inspection plan and must document the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. (265.15)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
b) Areas subject to spills (i.e., loading and unloading areas, container storage areas, etc.) are inspected daily when in use and according to other applicable regulations when not actively in use. (265.15(b)(4))	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
7. The facility has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Need Refresher
8. The facility keeps all records required by Section 265.16(d)(e) including written job titles, job descriptions and documented employee training records.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
9. If required due to the actual hazards associated with Ignitable, Reactive or incompatible waste materials, the facility meets the following requirements (Section 265.17).				
a) Protection from sources of ignition.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
b) Physical separation of incompatible waste materials.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
c) "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
d) Any comingling of waste materials is done in a controlled, safe manner as prescribed by Section 265.17(b).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

RCRA INTERIM STATUS INSPECTION FORM

PART 4. GENERAL INTERIM STATUS REQUIREMENTS

SUBPARTS INCLUDED

B: General Facility Standards
C: Preparedness and Prevention

D: Contingency and Emergency
E: Manifest/Records/Reporting

G: Closure
H: Financial Requirements

Subpart B: General Facility Standards

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The operator has a detailed chemical and physical analysis of the wastematerial containing all of the information which must be known to properly treat or store the waste as required by Section 265.13(a)(1).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. The operator has a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste (Section 265.13(b)).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. a) Physical contact with the waste structures or equipment will not injure unknowing/unauthorized persons or livestock entering the facility (265.14(a)(1)).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
b) Disturbance of the waste will not cause a violation of the hazardous waste regulations (265.14(a)(2)).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
IF BOTH 3a AND 3b ARE "YES", MARK QUESTIONS 4 AND 5 "NOT APPLICABLE".				
4. The facility has -				
a) A 24-hour surveillance system, <u>or</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) An artificial or natural barrier <u>and</u> a means to control entry at all times (265.14(b)(2)).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

RCRA INTERIM STATUS INSPECTION FORM

Subpart C: Preparedness and Prevention

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Acid Spill
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32)				
a) Internal alarm system.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) Access to telephone, radio or other device for summoning emergency assistance.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) Portable fire control equipment.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) Water at adequate volume and pressure via hoses sprinkler, foamers or sprayers.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled. (265.34)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained. (265.35)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout. (265.37(a))	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented. (265.37(b))	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart D: Contingency and Emergency

1. The facility has a written Contingency Plan designed to minimize hazards from fires, explosions or unplanned releases of hazardous wastes (265.51) and contains the following components:
 - a) Actions to be taken by personnel in the event of an emergency incident.
 - b) Arrangements or agreements with local or state emergency authorities.
 - c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator.
 - d) A list of all emergency equipment including location, physical description and outline of capabilities.
 - e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel. (265.51(f))
2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan. (265.53)
3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan. (265.54)
4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan. (265.56)
5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56.

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Need to
change EMER
COORDINATOR

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart E: Manifests/Records/Reporting

NOTE : THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

1. The operator maintains a written operating record at his facility as required by Section 265.73 which contains the following information:
 - a) Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment storage or disposal. (262.73(b)(1))
 - b) Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).
 - c) The estimated (or actual) weight, volume or density of the waste material(s).
 - d) A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).
 - e) The present physical location of each hazardous waste within the facility.
 - f) FOR DISPOSAL FACILITIES, the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s). (265.73(b)(2))
 - g) Records of any waste analyses and trial tests required to be performed.
 - h) Records of the inspections required under Section 265.15 (General Inspection Requirements - Subpart B).
 - i) Records of any monitoring, testing or analytical data required under other Subparts as referenced by Section 265.73(b)(6).
 - j) Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart G.

_____	✓	_____	_____
_____	✓	_____	_____
_____	✓	_____	_____
_____	✓	_____	_____
_____	✓	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
2. The operators has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Section 265.75.	_____	_____	_____	_____
<u>NOTE</u> : THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO <u>ONLY</u> OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.				
3. Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years. (265.71)	_____	_____	_____	_____
a) If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met. (265.71(b))	_____	_____	_____	_____
b) Any significant discrepancies in the manifest, as defined in Section 265.72(a) are noted in writing on the manifest document. (265.71(a)(2))	_____	_____	_____	_____
4. Any manifest discrepancies have been reconciled within 15 days as required by Section 265.72(b) or the operator has submitted the required information to the Regional Administrator/Director.	_____	_____	_____	_____
5. If the facility has accepted any unmanifested hazardous wastes from off-site sources (except from small quantity generators) for treatment, storage, or disposal an unmanifested waste report containing all the information required by Section 265.76 has been submitted to the Regional Administrator/Director within 15 days.	_____	_____	_____	_____

Subpart G: Closure and Post-Closure

NOTE : THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES.

1. A written Closure Plan is on file at the facility and contains the following elements: (Section 265.112)	<input checked="" type="checkbox"/>	_____	_____	_____
a) A description of how and when the facility will be closed. (265.112(a)(1)).	<input checked="" type="checkbox"/>	_____	_____	_____

RCRA INTERIM STATUS INSPECTION FORM

2. A written cost estimate for closure of the facility (as specified in the closure plan) is available.

<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
<u>✓</u>	<u> </u>	<u> </u>	<u> </u>

REMARKS, PART 4. GENERAL INTERIM STATUS REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
b) A description of how any of the <u>applicable</u> closure requirements in other Subparts of Section 265 (Tanks, Surface Impoundments, Landfill, etc.) will be carried out.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility.(NOTE: Maximum inventory should agree with the permit.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) A description of steps taken to decontaminate facility equipment.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
e) The year closure is expected to begin and a schedule for the various phases of closure.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

Subpart H: Financial Requirements

1. The owner or operator of the facility has established financial assurance for closure by use of one of the following: (265.143)
 - a) A closure trust fund, or
 - b) A surety bond, or
 - c) A closure letter of credit, or
 - d) A combination of financial mechanisms.

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

NOTE : COMPLIANCE WITH THESE REGULATIONS IS A FEDERAL REQUIREMENT.

Need Liability
INSURANCE

RCRA INTERIM STATUS INSPECTION FORM

PART 5. TREATMENT/STORAGE/DISPOSAL

SUBPARTS INCLUDED

I: Management of Containers	L: Waste Piles	O: Incinerators
J: Management of Tanks	M: Land Treatment	P: Thermal Treatment
K: Surface Impoundments	N: Landfills	Q: Chemical/Physical/Biological Treatment

Subpart I: Management of Containers

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Hazardous wastes are stored in containers which are:				
a) Closed (265.173)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) In good physical condition (265.171)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) Compatible with the wastes stored in them (265.172)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Containers are stored closed except when it is necessary to add or remove wastes. (265.173(a))	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Hazardous waste containers are not stored, handled or opened in a manner which may rupture the container or cause it to leak. (265.173(b))	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented. (265.174)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
5. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 meters) from the property line and the general requirements for handling such wastes in Section 265.17 (physical separation, signs and safety) are met (265.176).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
6. Containers holding hazardous wastes are never stored near other materials which may interact with the waste in a hazardous manner. (265.177(c))	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	



Re: Jefferson County
Timet
Hazardous Materials
#04-41-0565

Timet Division
Titanium Metals Corporation
100 Titanium Way
Toronto, Ohio 43964

June 25, 1982

Attention: Ms. Deborah Stauver

Dear Ms. Stauver:

On June 23, 1982, this writer conducted a follow-up inspection of your facility for hazardous materials. During the April 29, 1982 inspection, the following problems were noted; corrective action is then explained:

1. Annual report - the facility report was submitted to Ohio EPA on May 3, 1982.
2. Waste analysis plan - a comprehensive plan had been prepared, and appeared to be acceptable.
3. Containers - the leaking kolene sludge drums had been repacked, and the spilled material cleaned up.
4. Acid storage tanks - problems with calibration of the new tank guages had been corrected, and preventative measures taken around the catch basin to reduce chances of spills to the Ohio River.

Timet now appears to be in substantial compliance with the applicable State and Federal hazardous waste regulations, and the conditions of its permit. Your prompt attention to this matter and cooperation is greatly appreciated.

Sincerely,

Michael Moschell
Environmental Scientist
Division of Hazardous Materials Management

MM:dm

cc: Paula Cotter, DHMM, C.O.
cc: Bob Fragale, HMFAB
cc: Kathy Homer, USEPA, Region V

Ohio EPA

Re: Jefferson County
Timet Division
Hazardous Materials
#04-41-0565

Titanium Metals Corp. of America
Timet Division
P. O. Box 309
Toronto, Ohio 43964

May 10, 1982

Attn: Ms. Deborah Stauver

Dear Ms. Stauver:

On April 29, 1982, Ohio EPA conducted an inspection of your facility to determine compliance with State and Federal hazardous waste regulations. Considerable improvement was noted in Timet's hazardous waste program from the previous inspection. Most of the required plans and reports had been well prepared. At the time of inspection, the following problem areas were noted:

1. Annual report - the 'Part B' of the annual report, for hazardous waste facilities, had not been submitted. A copy of the report form should be obtained from our Central Office, and completed and returned as soon as possible. You should contact Tom Crepeau at 466-1584.
2. Waste analysis plan - a plan for the testing of hazardous waste materials had not been prepared. The plan should include test methods and sampling procedures to impliment should the character of the waste change.
3. Container storage - several drums of kolene(potassium hydroxide) were leaking, and were not in good condition. Not all drums were properly labelled. The problems with the drums were not noted on the weekly inspection log of the storage area.
4. Operating log - a comprehensive operating log had not been compiled, however, most of the required data was available.
5. Waste acid storage tanks - a method should be devised to contain spills from the storage tanks. It is my understanding the plant is working with the Southeast District Industrial Wastewater Section on this problem. The storm water drains should be controlled so any spills do not reach the Ohio River.

The above listed deficiencies should be corrected as soon as possible. Please verify this by correspondence within sixty days.

Timet Division

May 10, 1982

Page 2

A copy of the completed inspection form is enclosed, Please call if there are any questions.

Sincerely,

Michael Moschell
Environmental Scientist
Division of Hazardous Materials Management

MM:fgs

cc: Paula Cotter-DHM-C.O.

cc: Kathy Homer-Region V-USEPA

cc: Bob Fragale-HWFAB-C.O.

enclosure

RCRA INTERIM STATUS INSPECTION FORM

PART 1. GENERAL INFORMATION

U.S. EPA I.D. NO. OHDO98435134

Facility: TIMET DIV, TITANIUM METALS Address: 100 TITANIUM WAY City: TORONTO
State: OHIO Zip Code: 43964 County: Jefferson Telephone: 614-537-1571
Facility Operator: SAME Title: _____ Telephone: _____
Facility Owner: TIMET DIV, TITANIUM METALS Address: P.O. Box 309
City: TORONTO State: OHIO Zip Code: 43964 Telephone: 614-537-1571
Type of Ownership: ☒ Private _____ Government State HWFAB No. 04-41-0565

Date of Inspection: 4-29-82 Time of Inspection: (Start) 1:00 (Finish) 2:45Advance Notification? ☐ No ☒ Yes: 1 weekWeather Conditions: Clear - 65°F

INSPECTION PARTICIPANT(S)

	(Name)	(Title)	(Telephone)
1.	<u>D. STAUVER</u>	<u>ENV. ENGR.</u>	<u>537-1571</u>
2.	_____	_____	_____
3.	_____	_____	_____
4.	_____	_____	_____

RCRA INTERIM STATUS INSPECTION FORM

INSPECTOR(S)

	(Name)	(Title)	(Telephone)
1.	<u>M. Moschell</u>	<u>ENV. SCI.</u>	<u>385-8501</u>
2.	<u> </u>	<u> </u>	<u> </u>
3.	<u> </u>	<u> </u>	<u> </u>
4.	<u> </u>	<u> </u>	<u> </u>

1. Type(s) of hazardous waste site activity: A. ☒ Generation B. ☒ Storage C. ☐ Treatment
D. ☐ Transportation E. ☐ Disposal

2. Specific hazardous wastes handled at this facility (EPA HW#):

a) Listed Wastes: FOO1-TRICHLOROETHANE, K062-SPENT PICKLE LIQUOR
(NITRIC, SULFURIC, HYDROFLUORIC ACIDS)

b) Non-Listed Wastes: I ☒ C R T
D001 D002 D003 D000

D002-POTASSIUM HYDROXIDE

3. Has this facility submitted a Part A Permit Application? ☒ Yes ☐ No

4. Does this facility store, treat or dispose of any hazardous waste from any off-site domestic sources?

 Yes, See Remark # ☒ No

RCRA INTERIM STATUS INSPECTION FORM

5. Does this facility store, treat or dispose of any hazardous waste from any foreign sources?

_____ Yes, See Remark # _____

☒ No

6. Does this facility transport hazardous waste materials off-site for itself or other generators?

_____ Yes, Complete Part 3 (Transp.)

☒ No

a) Applicable U.S. EPA I.D. Number _____

b) Ohio P.U.C.O. GR TRSF Number _____

7. A brief description of site activity:

Forging, Rolling, Pickling of titanium

REMARKS, PART 1. (GENERAL INFORMATION)

RCRA INTERIM STATUS INSPECTION FORM

PART 2. GENERATOR REQUIREMENTS

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Sections 261 and 3745-51 in compliance with the requirements of Sections 262.11 and 3745-52-11.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Does this facility generate any hazardous wastes that are excluded from regulation under Sections 261.4 and 3745-51-04 (statutory exclusions) or Sections 261.6 and 3745-51-06 (recycle/reuse)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Solvents Recycled
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Sections 265.1(c)(9) and 3745-55-C-9 or via operation of an elementary neutralization unit and/or wastewater treatment unit (Sections 265.1(c)(10) and 3745-55-C-10.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Sections 262.21(a), (b) and 3745-52-21-A-B and the minimum number of copies required by Sections 262.22 and 3745-52-22.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Sections 262.20 and 3745-52-20.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Sections 262.23 and 3745-52-23.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Sections 262.42(a), (b) and 3745-52-42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	NONE
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Sections 262.40 and 3745-52-40.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
5. The generator meets the following hazardous waste pre-transport requirements:				
a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Sections 262.30, 262.31 and 262.32(a) and 3745-52-30, 52-31, and 52-32-A).	✓	—	—	—
b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 Liters) or less is affixed with a completed hazardous waste label as required by Sections 262.32(b) and 3745-52-32-B.	✓	—	—	—
c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Sections 262.33 and 3745-52-33.	✓	—	—	—
6. The generator meets the following recordkeeping and reporting requirements:				
a) The generator has submitted an annual report for all hazardous waste shipped off-site as required by Sections 262.41(a) and 3745-52-41-A-B.	✓	—	—	—
b) The generator has submitted an annual report for all hazardous waste treated, stored or disposed of on-site as required by Sections 262.41(b) and 3745-52-41-C and in compliance with Sections 265.71 and 3745-55-71, when applicable.	—	✓	—	Will Be
7. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Sections 262.50 and 3745-52-50.	—	—	✓	—
8. If the generator elects to store hazardous waste on-site in <u>containers</u> or <u>tanks</u> for <u>90 days</u> or less without a RCRA storage permit as provided under Sections 262.34 and 3745-52-34, the following requirements with respect to such storage are met:				
a) <u>Containers:</u> the waste is stored in closed containers which meet all applicable DOT pre-transport requirements for packaging, labeling and marking.	—	—	✓	PERMITTED STORAGE
	—	—	—	see Subpart I (pg. 5-1)

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
b) The date that accumulation began is clearly marked on each container.	—	—	—	—
c) The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented (265.174 and 3745-56-54).	—	—	—	—
d) Containers holding ignitable or reactive waste(s) are located at least 50 feet (15 Meters) from the property line (Sections 265.176 and 3745-56-56), and the general requirements for handling such wastes in Sections 265.17 and 3745-55-17 (physical separation, signs and safety) are met.	—	—	—	—
e) <u>Tanks:</u> the tank(s) are operated in compliance with the safety requirements of Sections 265.17, 265.192(b), 3745-55-17 and 56-72-B and are equipped with a waste-feed cutoff or bypass system as required in Sections 265.192(d) and 3745-56-72-D.	✓	—	—	WASTE ACID
f) Uncovered tanks have at least 2 feet (60 cm.) of freeboard unless they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide (265.192 (c) and 3745-56-72-C).	—	—	✓	ALL Covered
g) Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard (265.194 and 3745-56-74-A-B-C).	✓	—	—	—
h) Weekly inspections are made of all tank construction materials and containment structures (265.194 and 3745-56-74-D-E).	✓	—	—	—
9. The generator has provided a Personnel Training Program in compliance with Sections 265.16(a)(b)(c) and 3745-55-16-A-B-C including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course (Sections 262.34 and 3745-52-34).	✓	—	—	—
10. The generator keeps all of the records required by Sections 265.16(d)(e) and 3745-55-16-D-E including written job titles, job descriptions and documented employee training records (Sections 262.34 and 3745-52-34).	✓	—	—	—

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

11. Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of (Sections 265.197 and 3745-56-77) as referenced in Sections 262.34 and 3745-52-34.

NOTE: SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265, SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND 3745-55-30 THRU 37 AND 3745-55-50 THRU 70 BE MET. COMPLETE THESE SECTIONS OF THE INSPECTION FORM UNDER PART 4 - GENERAL INTERIM STATUS REQUIREMENTS.

REMARKS, PART 2. GENERATOR REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

PART 3. TRANSPORTER REQUIREMENTS

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The transporter has not transported any hazardous wastes without having first received a U.S. EPA Identification Number and registering with the Public Utilities Commission of Ohio. (263.11 and 3745-53-11).	_____	_____	<u>X</u>	_____
2. The transporter has not accepted any hazardous wastes for transport unless the waste was accompanied by a manifest prepared by the generator in accordance with Sections 262 and 3745-52.	_____	_____	_____	_____
3. The transporter has signed the manifest as required by Section 263.20(b) and 3745-53-20-B and has carried the manifest with the waste shipment as required by 263.20(c) and 3745-53-20-C.	_____	_____	_____	_____
4. Upon delivery of the hazardous waste to the next transporter or the designated facility, the transporter has signed the manifest as required in Section 263.20 (d) and 3745-53-20-D and has retained a signed copy (available for inspection) for at least 3 years (263.22(a) and 3745-53-22-A).	_____	_____	_____	_____
5. The transporter has delivered the entire quantity of hazardous waste accepted from the generator in accordance with manifest instructions; in cases where this was not possible the transporter has contacted the generator for further instructions and revised the manifest accordingly (263.21 and 3745-53-21).	_____	_____	_____	_____
6. If hazardous waste has been delivered to rail transporters or water transporters, the original transporter has complied with the manifest handling requirements of Sections 263.20(e)(f) and 3745-53-20-E-F.	_____	_____	_____	_____
7. If hazardous waste has been shipped out of the country, the transporter has retained signed copies of the manifest (available for inspection for at least 3 years) indicating that the waste left the U.S.A. (263.22(c) and 3745-53-22-C).	_____	_____	_____	_____
8. Has the transporter ever had a discharge of hazardous waste during time that the waste was under his control?	_____	_____	_____	_____
a) Was immediate action taken? (Notify authorities, dike discharge) (263.30 (a) and 3745-53-30-A).	_____	_____	_____	_____

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
b) Were all of the notifications required by Sections 263.30(c)(d) and 3745-53-30-C-D made?	_____	_____	_____	_____
c) Was the discharge cleaned up as required by Sections 263.31 and 3745-53-31?	_____	_____	_____	_____
9. Does the transporter store hazardous wastes temporarily while they are in transit?	_____	_____	_____	_____
a) Manifested wastes are not stored for longer than 10 days ("Transfer Facility") and remain properly DOT-packaged during storage. (263.12 and 3745-53-12)	_____	_____	_____	_____

NOTE: TEMPORARY STORAGE IN STATIONARY TANKS IS NOT PERMITTED UNDER TRANSFER FACILITY REQUIREMENTS AND SUCH STORAGE REQUIRES A RCRA PERMIT APPLICATION AND IS SUBJECT TO INTERIM STATUS REQUIREMENTS FOR STORAGE FACILITIES. ANY TYPE OF STORAGE BY THE TRANSPORTER WHICH IS NOT SPECIFICALLY AUTHORIZED UNDER SECTION 263.12, TRANSFER FACILITY REQUIREMENTS, IS SUBJECT TO FULL RCRA REGULATION.

10. Does the transporter import hazardous waste into the United States?	_____	_____	_____	_____
11. Does the transporter mix hazardous wastes of different U.S. DOT shipping descriptions by placing them into a single container?	_____	_____	_____	_____

NOTE: A TRANSPORTER THAT IMPORTS HAZARDOUS WASTES OR MIXES WASTES AS DEFINED IN SECTIONS 263.10(c) AND 3745-53-10-C BECOMES A GENERATOR AND IS SUBJECT TO THE REQUIREMENTS OF SECTIONS 262 AND 3745-52.

REMARKS, PART 3. TRANSPORTER REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

PART 4. GENERAL INTERIM STATUS REQUIREMENTS

SUBPARTS INCLUDED

B: General Facility Standards	E: Manifest/Records/Reporting	H: Financial Requirements
C: Preparedness and Prevention	F: Ground Water Monitoring	
D: Contingency and Emergency	G: Closure	

Subpart B: General Facility Standards

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The operator has a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by Sections 265.13(a)(1) and 3745-55-13-A-2.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. The operator has a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste (Sections 265.13(b) and 3745-55-13-B).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3. If required due to the actual hazards associated with the waste material, the operator has prevented unauthorized access to the active portions of the facility and has provided the following features and equipment (Sections 265.14 and 3745-55-14).				
a) 24 hour surveillance system.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) Artificial or natural barrier completely surrounding the active portion of the facility.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) Controlled entry (gates, monitors) to the active portion of the facility at all times (265.14(2)(ii) and 3745-55-14-B-2-b).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) "Danger-Unauthorized Personnel Keep Out" signs at each entrance to the active portion of the facility (265.14(c) and 3745-55-14-C).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
4. The operator must develop and follow a comprehensive, written inspection plan and must document the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. The plan includes the following elements: (Sections 265.15 and 3745-55-15)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
a) Inspect emergency equipment.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) Inspect monitoring equipment.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) Inspect security, alarm and communications devices.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) Inspect process equipment (pipes, pumps, etc.).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
e) Inspect containment structures (dikes, curbs, etc.).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
f) Inspect facility for structural malfunctions (roof, floor, etc.).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
g) Inspect hazardous waste handling/loading areas each day used.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
h) Record of any malfunctions due to equipment or operator errors.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
i) Record of any hazardous waste discharges.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. The facility has provided a Personnel Training Program in compliance with Sections 265.16(a)(b)(c) and 3745-55-16-A-B-C including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. The facility keeps all records required by Sections 265.16(d)(e) and 3745-55-16-D-E including written job titles, job descriptions and documented employee training records.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. If required due to the actual hazards associated with Ignitable, Reactive or incompatible waste materials, the facility meets the following requirements (Sections 265.17 and 3745-55-17).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
a) Protection from sources of ignition.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) Physical separation of incompatible waste materials.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
d) Any co-mingling of waste materials is done in a controlled, safe manner as prescribed by Sections 265.17(b) and 3745-55-17-B.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Subpart C: Preparedness and Prevention

1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31 and 3745-55-31).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Acid Spill
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32 and 3745-55-32).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
a) Internal alarm system	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) Access to telephone, radio or other device for summoning emergency assistance.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) Portable fire control equipment.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) Water at adequate volume and pressure via hoses sprinklers, foamers or sprayers.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33 and 3745-55-33).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled (Sections 265.34 and 3745-55-34).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained (265.35 and 3745-55-35).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout (265.37(a) and 3745-55-37-A).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented (265.37(b) and 3745-55-37-B).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Subpart D: Contingency and Emergency

1. The facility has a written Contingency Plan designed to minimize hazards from fires, explosions or unplanned releases of hazardous wastes (265.51 and 3745-55-51) and contains the following components:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
a) Actions to be taken by personnel in the event of an emergency incident.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Arrangements or agreements with local or state emergency authorities.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) A list of all emergency equipment including location, physical description and outline of capabilities.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel (Sections 265.51(f) and 3745-55-51-F).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all Local and State emergency service authorities that might be required to participate in the execution of the plan. (Sections 265.53 and 3745-55-53).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan (265.54 and 3745-55-54).
4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan (Sections 265.55 and 3745-55-55).
5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56 and 3745-55-56.

<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
<u>✓</u>	<u> </u>	<u> </u>	<u>will</u> <u>Revise</u>

Subpart E: Manifests/Records/Reporting

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

Yes No N/A Remark #

1. The operator maintains a written operating record at his facility as required by Sections 265.73 and 3745-55-73 which contains the following information:
 - a) Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment, storage, or disposal (262.73(b)(1) and 3745-55-73-B-1).
 - b) Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).
 - c) The estimated (or actual) weight, volume or density of the waste material(s).
 - d) A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).

<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u>✓</u>	<u> </u>
<u>✓</u>	<u> </u>	<u> </u>	<u> </u>

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
e) The present physical location of each hazardous waste within the facility.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
f) <u>FOR DISPOSAL FACILITIES</u> , the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s) (265.73(b)(2) and 3745-55-73-B-2).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
g) Records of any waste analyses and trial tests required to be performed.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
h) Records of the inspections required under Sections 265.15 and 3745-55-15 (General Inspection Requirements - Subpart B).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
i) Records of any monitoring, testing or analytical data required under other Subparts as referenced by Sections 265.73(b)(6) and 3745-55-73-B-6.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
j) Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart H and Section 3745-56-30, 32 and 34.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. The operator has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Sections 265.75 and 3745-55-75.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
<u>NOTE:</u> THIS REPORT IS NOT THE SAME AS THE REPORT REQUIRED TO BE FILED BY GENERATORS UNDER SECTIONS 262.41 AND 3745-52-41.				
3. When applicable, the operator has submitted reports on releases of hazardous wastes, fires, explosions, groundwater contamination data and facility closure (265.77 and 3745-55-77).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	will Re

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

4. Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years (Sections 265.71 and 3745-55-71).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
--	--------------------------	--------------------------	-------------------------------------	--

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
a) If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met (265.71(b) and 3745-55-71-B).	—	—	<u>X</u>	—
b) Any significant discrepancies in the manifest, as defined in Sections 265.72(a) and 3745-55-72-A, are noted in writing on the manifest document (Sections 265.71(a)(2) and 3745-55-71-A-2).	—	—	<u>X</u>	—
5. Any manifest discrepancies have been reconciled within 15 days as required by Sections 265.72(b) and 3745-55-72-B <u>or</u> the operator has submitted the required information to the Regional Administrator/Director.	—	—	—	—
6. If the facility has accepted any unmanifested hazardous wastes from off-site sources (except from small quantity generators) for treatment, storage or disposal an unmanifested waste report containing all the information required by Sections 265.76 and 3745-55-76 has been submitted to the Regional Administrator/Director within 15 days.	—	—	—	—

Subpart F: Groundwater Monitoring

NOTE: THESE REQUIREMENTS ARE APPLICABLE TO SURFACE IMPOUNDMENTS, LANDFILLS AND LAND TREATMENT FACILITIES ON AND AFTER NOVEMBER 19, 1981.

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The facility has implemented one or more of the following alternatives with respect to the Groundwater Monitoring requirements in Sections 265.90(a) and 3745-55-90-A:				
a) A Groundwater Monitoring System meeting the minimum requirements of Sections 265.91 and 3745-55-91 has been installed which is sampled, tested and operated in accordance with the requirements of Sections 265.92, 265.93, 265.94, 3745-55-92, -93 and -94.	—	—	—	—

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
b) A waiver of all or part of the Groundwater Monitoring requirements has been obtained by demonstrating a low potential for the migration of hazardous wastes and constituents in accordance with the requirements of Sections 265.90(c) and 3745-55-91-C.	<u> </u>	<u> </u>	<u> </u>	<u> </u>
c) An alternate Groundwater Monitoring System Plan that was first submitted to the Regional Administrator/Director was implemented and is operated and maintained in accordance with Sections 265.90(d) and 3745-55-90-D.	<u> </u>	<u> </u>	<u> </u>	<u> </u>

Subpart G: Closure and Post-Closure

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES:

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. A written Closure Plan is on file at the facility and contains the following elements: (Sections 265.112 and 3745-56-03)	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
a) A description of how and when the facility will be closed (265.112(a)(1) and 3745-56-03-A-1).	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
b) A description of how any of the applicable closure requirements in other Subparts of Sections 265 and 3745-55,-56,-57,-58 (Tanks, Surface Impoundments, Landfills, etc.) will be carried out.	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
c) An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility.	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
d) A description of steps taken to decontaminate facility equipment.	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
e) The year closure is expected to begin and a list of dates over which the various phases of closure are expected to be completed.	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
2. The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates.	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
3. The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process.	—	✓	—	—
4. If Closure has been completed, the facility was closed in a manner which minimizes any future problems in compliance with the Closure performance standard in Sections 265.111 and 3745-56-02.	—	—	✓	—
a) The facility has been closed within the time limits specified in Sections 265.113 and 3745-56-04.	—	—	—	—
b) Upon completion of Closure all facility equipment and structures were decontaminated and any hazardous residues were properly disposed of (265.114 and 3745-56-05).	—	—	—	—
c) Completion of Closure has been certified to the Regional Administrator by the Owner/Operator and an independent Professional Engineer (265.115 and 3745-56-06).	—	—	—	—

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY DISPOSAL FACILITIES.

5. A written Post-Closure Plan is on file at the facility which describes all Post-Closure activities and addresses all of the plan elements required by Sections 265.118(a) and 3745-56-08-A.	—	—	X	—
6. The Post-Closure Plan has been amended within 60 days in response to any changes in facility design or operation.	—	—	—	—
7. The Post-Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning Closure.	—	—	—	—
8. The Owner/Operator has submitted all of the information on prior use of the property required in Sections 265.119 and 3745-56-10 to the Local Land Authority within 90 days after Closure is completed.	—	—	—	—

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

9. The property owner has attached a notation to the property deed or other instrument which will notify any potential purchaser that the property has been used to manage hazardous waste and future use of the property is restricted under Sections 265.117(c) and 3745-56-08-C as required in Sections 265.120 and 3745-56-10.

Subpart H: Financial Requirements

1. A written cost estimate for Closure of the facility (by the methods and procedures specified in the facility Closure Plan) is available for review on and after May 19, 1981 (Sections 265.142 and 3745-56-32).

☒ _____

NOTE: REGULATIONS PROMULGATED IN 46 FR 2877-2892 IN REGARD TO FINANCIAL REQUIREMENTS HAVE BEEN STAYED UNTIL OCTOBER 13, 1981 AND MAY BE AMENDED OR REPROPOSED AT THAT TIME.

REMARKS, PART 4. GENERAL INTERIM STATUS REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

PART 5. TREATMENT/STORAGE/DISPOSAL

SUBPARTS INCLUDED

I: Management of Containers	L: Waste Piles	O: Incinerators
J: Management of Tanks	M: Land Treatment	P: Thermal Treatment
K: Surface Impoundments	N: Landfills	Q: Chemical/Physical/Biological Treatment

Subpart I: Management of Containers

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Hazardous wastes are stored in closed containers which are in good physical condition and are compatible with the wastes stored in them (Sections 265.171, .172, .173 and 3745-56-51, -52-53).	—	X	—	#1
2. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented (265.174 and 3745-56-54).	✓	—	—	#2

NOTE: FACILITIES OPTING FOR LONG TERM STORAGE ARE NOT REQUIRED TO MEET PRE-TRANSPORT LABELING REQUIREMENTS UNTIL THE CONTAINERS ARE ACTUALLY OFFERED FOR TRANSPORT AND ARE NOT REQUIRED TO AFFIX AN ACCUMULATION DATE. (SECTIONS 262 AND 3745-52)

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
3. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 Meters) from the property line and the general requirements for handling such wastes in Sections 265.17 and 3745-55-17-B (physical separation, signs and safety) are met (265.176 and 3745-56).	—	—	✓	—
4. Incompatible waste materials are not placed in the same containers or put in contaminated containers unless it is done under completely controlled and safe conditions as specified in Sections 265.17(b) and 3745-55-17-B (Sections 265.177(a), (b) and 3745-56-57-A-B).	✓	—	—	—

#1 - KOLENE DRUMS - SOME LEAKING, NOT IN GOOD CONDITION
 #2 - PROBLEMS NOT DOCUMENTED DURING WEEKLY INSPECTIONS.

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

5. Containers holding hazardous wastes are never stored near other materials which may interact with the waste in a hazardous manner (Sections 265.177 (C) and 3745-56-57-C).

✓

Subpart J: Storage in Tanks

1. The tank(s) are operated in compliance with the safety requirements of Sections 265.17, 265.192(b), 3745-55-17 and 3745-56-72-B and are equipped with a waste-feet cutoff or bypass system as required in Sections 265.192(d) and 3745-56-72-D.

TANKS < 90 days

2. Uncovered tanks have at least 2 feet (60 cm.) of freeboard unless they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide (265.192 (c) and 3745-56-72-C).

3. Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard (265.194 and 3745-56-74).

4. Weekly inspections are made of all tank construction materials and containment structures (265.194 and 3745-56-74).

5. Whenever tanks are used to treat or store wastes substantially different from previous wastes or when substantially different treatment processes are used in the tank, the facility has insured the safety of such changes by one or both of the following methods: (Sections 265.193(a) and 3745-56-73-A).

- a) A complete waste analysis plus bench scale tests or pilot tests were conducted prior to implementing the proposed changes and all data is on file in the facility operating record.

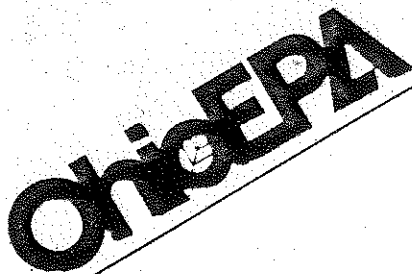
- b) Written, documented information on similar storage or treatment process changes was obtained prior to implementing the proposed changes and all documentation is on file in the facility operating record.

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
6. With the exception of emergency situations, whenever Ignitable or Reactive wastes are placed in tanks the facility has insured the safety of the operation by one or both of the following methods, (Sections 265.198(a) and 3745-56-78).	_____	_____	_____	_____
a) The waste is treated immediately before or after being placed in the tank so that it is no longer Ignitable or Reactive and such treatment is done in compliance with the safety requirements of Sections 265.17(b) and 3745-55-17-B.	_____	_____	_____	_____
b) The waste is stored or treated under protected conditions eliminating the possibility of ignition or reaction.	_____	_____	_____	_____
7. Covered tanks used to treat or store Ignitable or Reactive wastes are in compliance with NFPA buffer zone requirements (Flammable and Combustible Code-1977) (Sections 265.198(b) and 3745-56-78-B).	_____	_____	_____	_____
8. Incompatible waste materials are not placed in the same tanks or put in contaminated tanks unless it is done under completely controlled and safe conditions as specified in Section 265.17(b) (Sections 265.199 and 3745-56-79).	_____	_____	_____	_____
9. Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of (Sections 265.197 and 3745-56-77).	_____	_____	_____	_____

Subpart K: Surface Impoundments

1. The Surface Impoundment is designed to operate with at least 2 feet (60 cm.) of freeboard and has a structural containment system adequate to contain the waste material (Sections 265.222 and 3745-57-03).	_____	_____	_____	_____
2. Earthen structural containment systems are equipped with protective cover such as grass, shale or rock to minimize erosion from wind and water (265.22 and 3745-57-04).	_____	_____	_____	_____



Re: Application No.: 81-HW-0565
Jefferson County

September 25, 1981

RECEIVED

SEP 30 1981

WASTE MANAGEMENT BRANCH
EPA, REGION V

Ms. Debra Stauver
Environmental Engineer
TIMET
P.O. Box 309
Toronto, Ohio 43964

Dear Mr. Stauver:

On April 22, 1981, Pat Gorman of the Ohio Environmental Protection Agency conducted an inspection of your facility, as part of the Hazardous Waste facility permit review process. Your facility was represented by yourself.

Enclosed is a copy of the report completed when your facility was inspected. This form illustrates those areas inspected at your facility for compliance with Interim Status Standards.

The following is a list of items found to be in violation of current regulations or those areas which will be covered by regulations not yet effective. The capital letter codes found to the left of each item are explained on the last page of the enclosed inspection form. This deficiency notification is to be taken in conjunction with the inspection deficiency letter of May 5, 1981 issued by our Southeast District Office.

<u>CODE</u>	<u>PAGE NO.</u>	<u>ITEM</u>
		<u>Generator Requirements Item</u>
B	2-3	Part 2, 8, c Weekly inspection of containers and documentation.
B	2-3	Part 2, 9 Personnel training program.
B	2-3	Part 2, 10 Job titles, job descriptions, employee training records.
		<u>General Facility Standards</u>
B	3-1	Part 3, Subpart B, c, 4 Danger signs at entrance.
B	3-2	Part 3, Subpart B, d Operating record log.
B	3-2	1 Inspect emergency equipment.

B	3-2		2	Inspect monitoring equipment.
B	3-2		3	Inspect security, alarm, communications devices.
B	3-2		4	Inspect process equipment.
B	3-2		5	Inspect containment structures.
B	3-2		6	Inspect facility structure.
B	3-2		7	Inspect handling/loading areas.
B	3-2		8	Record equipment malfunctions or operator error.
B	3-2	Part 3, Subpart B, e		Personnel training program.
B	3-2	Part 3, Subpart B, f		Employment records.
	3-4	<u>Preparedness and Prevention</u>		
		Part 3, Subpart C, 2, a		Release of hazardous wastes.
		<u>Contingency and Emergency</u>		
B	3-5	Part 3, Subpart D, 3, a, 3		Names, addresses and phone numbers of all emergency coordinators.
B	3-6	Part 3, Subpart D, 3, c		Revisions to contingency plan.
		<u>Closure for Non-Disposal Facilities</u>		
B	3-7	Part 3, Subpart G, 4		Closure requirements.
B	3-7		a, 1	Description of how and when facility will be closed.
B	3-7		3	Estimate of maximum amount of hazardous waste.
B	3-7		4	Decontamination steps.
B	3-7		5	Closure schedule - dates.
B	4-1	Part 4, Subpart I, 1		Management of containers.
B	4-1		1, b	Weekly inspections.

You are hereby advised that total compliance with the regulations contained in 40 CFR 265 is required as a condition of continuing interim status with the U.S. EPA. Failure to list specific deficiencies in this communication does not relieve you from the responsibility of complying with all applicable regulations.

Very truly yours,

A handwritten signature in cursive script that reads "Paul Flanigan".

Paul Flanigan, P.E.
Hazardous Materials Management

PF:rfs

cc: Kathleen Homer, U.S. EPA
Pat Gorman, SEDO

CERTIFIED MAIL



Deborah Stauver
Titanium Metals Corporation of America
Timet Division
100 Titanium Way
Toronto, Ohio 43964

May 5, 1981

Dear Ms. Stauver:

The Ohio Environmental Protection Agency is cooperating with the U.S. EPA, Region V in carrying out the provisions of the Resource Conservation and Recovery Act of 1976 (PL 94-580). In this effort, personnel of the Ohio EPA are conducting inspections of facilities in Ohio that are engaged in the generation, transportation, storage, treatment, or disposal of hazardous waste materials.

This letter is to inform you that on March 22, 1981, an inspection of your facility, Timet Division, located in Toronto, Ohio, was conducted by Patrick Gorman, Solid Waste Scientist, Southeast District Office of the Ohio EPA. Your firm was represented by Deborah Stauver and Hiram Cotton. The following concerns pertaining to your operation were noted:

Inspections

40 CFR Section 265.174 requires documented inspections of the area where containers are stored for evidence of leaks or corrosion and must be done at least weekly. Under 40 CFR Section 265.15 a storage facility needs a comprehensive, written inspection plan and operating log documenting inspections. The inspection plan is kept for three years and includes inspection of: emergency equipment, monitoring equipment, security and alarm devices, process equipment (piping, pumps, etc.) containment structures (dikes, curbs, etc.), structural malfunctions, and waste unloading areas. The inspection plan also records malfunctions due to equipment failure or operator errors and any discharge of hazardous waste.

Training

40 CFR Section 262.34 requires a personnel training program in the safe operation of equipment and emergency response procedures. The program requires documented training records showing new employees were trained within six months and an annual refresher course was provided.

Contingency and Emergency Plan

40 CFR Section 265 Subpart D requires a written contingency plan designed to minimize the hazards from fires, explosions, or spills. Although Timet has a partial plan, the following need to be added.

1. Revisions to the plan in response to equipment failure or failure of the plan.
2. Name, address and telephone numbers of all persons qualified to act as emergency coordinator.

Closure Plan

40 CFR Section 265 Subpart G requires a closure plan for treatment, storage, or disposal facilities. Since Timet is a storage facility, a written closure plan is required to be kept at your facility and must include:

1. A description of how and when the facility will be closed.
2. An estimate of the maximum amount of waste in storage.
3. Steps to be taken in decontamination of facility equipment.
4. A list of dates for the various phases of closure.

The closure plan needs to be amended in response to changes in the facility design or equipment. The closure plan must be submitted to the regional administrator 180 days prior to closure. Completion of closure must be certified by the owner/operator and an independent professional engineer.

Waste Oil

Although waste oil is not now defined as a hazardous waste, it was apparent that more effort should be given to controlling the storage and pick-up of waste oil. A central storage area or several smaller storage areas along with more frequent pick-ups are recommended to control the excessive build up.

A copy of this letter and the inspection report will be sent to the U.S. EPA, Region V office in Chicago. Any enforcement action related to the inspection will be initiated by U.S. EPA's Enforcement Division. If you have any questions, contact me or Ms. Brenda Lillstrom, (312) 886-3899, of Region V.

Sincerely,

Patrick H. Gorman
Solid Waste Scientist
Office of Land Pollution Control

PHG:dm

cc: Hazardous Waste Task Force, C.O.
cc: Brenda Lillstrom, Region V, U.S. EPA

RCRA INTERIM STATUS INSPECTION FORM

PART 1. GENERAL INFORMATION

U.S. EPA IDENTIFICATION NUMBER:

GH0098435134

Facility:

Titanium Metals Corp. Timet Div

Address:

100 Titanium Way

City:

Toronto

State:

Ohio

Zip Code:

43964

Telephone:

(614) 537-1571

County:

Jefferson

Facility Operator:

Same as above

Title:

Telephone:

Facility Owner:

Allegheny Ludlum Industries + North East Tech

Address:

Two Oliver Plaza

City:

Pittsburgh

State:

Penn.

Zip Code:

15222

Telephone:

(412) 562-4000

County:

Allegheny

Type of Ownership:

☒ Private☐ Government

Date of Inspection:

4/22/81

Time of Inspection:

Advance Notification?

No

(Start)

11:30 AM

☒ Yes:

1 day

(Finish)

3:30

Weather Conditions:

55° Cloudy

INSPECTION PARTICIPANT(S)

(Name)

(Title)

(Telephone)

1.

Deborah Stauver

Env. Engineer

(614) 537-1571

2.

Hiriam Cotton

Mgr. Eng. - Maint.

"

3.

4.

RA INTERIM STATUS INSPECTION FORM

INSPECTOR(S)

	(Name)	(Title)	(Telephone)
1.	<u>Patrick H. Gorman</u>	<u>Solid Waste Specialist</u>	<u>(614) 385-3501</u>
2.	_____	_____	_____
3.	_____	_____	_____
4.	_____	_____	_____

1. Type(s) of hazardous waste site activity:

A. ☒ Generation B. ☒ Storage C. _____ Treatment
 D. _____ Disposal E. _____ Off-Site Transportation

2. Specific hazardous wastes handled at this facility (EPA HW#):

a) Listed Wastes: F001 - 114, 104, 105, 106

b) Non-Listed Wastes: D001 I ☒ D002 C D003 R D000 T

SPENT ACID - COMBO. Nitric, Hydrofluoric, Sulfuric
Potassium hydroxide Solids -

3. Has this facility submitted a Part A Permit Application? ☒ Yes _____ No

4. Does this facility store, treat or dispose of any hazardous waste from any off-site domestic sources?

_____ Yes, See Remark # _____ ☒ No

RCRA INTERIM STATUS INSPECTION FORM

5. Does this facility store, treat or dispose of any hazardous waste from any foreign sources?

_____ Yes, See Remark # _____

X No

6. Does this facility transport hazardous waste materials off-site for itself or other generators?

_____ Yes, Part 263 applies

X No

a) Applicable U.S. EPA I.D. Number _____

b) Ohio P.U.C.O. GR TRSF Number _____

REMARKS, PART 1. GENERAL INFORMATION

PART 2. GENERATOR REQUIREMENTS (Section 262)

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Section 261 in compliance with the requirements of Section 262.11.	<u>X</u>	—	—	—
2. Does this facility generate any hazardous wastes that are excluded from regulation under Sections 261.4 (statutory exclusions) or 261.6 (recycle, reuse)?	—	<u>X</u>	—	<u>#1</u>
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Section 265.1(c)(9)) or via operation of an elementary neutralization unit and/or wastewater treatment unit (Section 265.1(c)(10))?	—	<u>X</u>	—	—
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Section 262.21(a), (b) and the minimum number of copies required by Section 262.22.	<u>X</u>	—	—	—
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Section 262.20.	<u>X</u>	—	—	—
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Section 262.23.	<u>X</u>	—	—	—
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Section 262.42(a), (b).	<u>X</u>	—	—	—
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Section 262.40.	<u>X</u>	—	—	—

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
5. The generator meets the following hazardous waste pre-transport requirements:				
a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked accordance with applicable DOT regulations (Sections 262.30, 262.31 and 262.32(a)).	<u>X</u>	—	—	—
b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 Liters) or less is affixed with a completed hazardous waste label as required by Section 262.32(b).	<u>X</u>	—	—	—
c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Section 262.33.	<u>X</u>	—	—	—
6. The generator meets the following record-keeping and reporting requirements:				
a) The generator has submitted an annual report for all hazardous waste shipped off-site as required by Section 262.41(a).	—	—	<u>X</u>	—
b) The generator has submitted an annual report for all hazardous waste treated, stored or disposed of on-site as required by Section 262.41(b) and in compliance with Section 265.71, when applicable.	—	—	<u>X</u>	—
7. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Section 262.50.	—	—	<u>X</u>	—
8. If the generator elects to store hazardous waste on-site in <u>containers or tanks</u> for <u>90 days or less</u> without a RCRA storage permit as provided under Section 262.34, the following requirements with respect to such storage are met:				<u>#2</u>
a) <u>Containers</u> : the waste is stored in <u>closed</u> containers which meet all applicable DOT pre-transport requirements for packaging, labeling and marking.	<u>X</u>	—	—	—

RCRA INTERIM STATUS INSPECTION FORM

	Yes	No	N/A	Remark #
b) The date that accumulation began is clearly marked on each container.	X			
c) The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented (265.174).		X		# 3
d) Containers holding ignitable or reactive waste(s) are located at least 50 feet (15 Meters) from the property line, and the general requirements for handling such wastes in Section 265.17 (physical separation, signs and safety) are met (265.176).			X	
e) Tanks: the tank(s) are operated in compliance with the safety requirements of Section 265.17 and 265.192(b) and are equipped with a waste-feed cutoff or bypass system as required in Section 265.192 (d).	X			
f) Uncovered tanks have at least 2 feet (60 cm.) of freeboard <u>unless</u> they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide (265.192(c)).			X	
g) Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard (265.194).	X			
h) Weekly inspections are made of all tank construction materials and containment structures (265.194).	X			
9. The generator has provided a Personnel Training Program in compliance with Section 265.16(a)(b) (c) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course. (Sec. 262.34)		X		
10. The generator keeps all of the records required by Section 265.16(d)(e) including written job titles, job descriptions and documented employee training records. (Sec. 262.34)		X		

A INTERIM STATUS INSPECTION F

Yes No N/A Remark #

11. Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of (Section 265.197). (Sec. 262.34)

X

NOTE: SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265, SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) BE MET. COMPLETE THESE SECTIONS OF THE INSPECTION FORM UNDER "PART 3 - GENERAL INTERIM STATUS REQUIREMENTS (SECTION 265)."

REMARKS, PART 2. GENERATOR REQUIREMENTS

#1 - Fuel being stored, will be reclaimed

#2 - Documentation
Waste was stored for over 90 days at the time of inspection. However, the company indicated this would not be the case in the future

#3 - No documentation.

PART 3. GENERAL INTERIM STATUS REQUIREMENTS (Section 265)

SUBPARTS INCLUDED

1. Subpart B: General Facility Standards
2. Subpart C: Preparedness and Prevention
3. Subpart D: Contingency and Emergency
4. Subpart G: Closure for Non-Disposal Facilities

Subpart B: General Facility Standards

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The facility meets all requirements under General Facility Standards in Section 265, Subpart B:				
a) The operator has a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by Sec. 265.13(a)(1).	X	—	—	—
b) The operator has a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste (Section 265.13(b)).	—	X	X	#1
c) If required due to the actual hazards associated with the waste material, the operator has prevented unauthorized access to the active portions of the facility and has provided the following features and equipment (Section 265.14).	—	—	X	#2
1. 24 hour surveillance system.	X	—	—	—
2. Artificial or natural barrier completely surrounding the active portion of the facility.	X	—	—	—
3. Controlled entry (gates, monitors) to the active portion of the facility at all times (265.14(2)(ii)).	X	—	—	—
4. "Danger-Unauthorized Personnel Keep Out" signs at each entrance to the active portion of the facility (265.14(c)).	—	X	—	—

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
d) The operator must develop and follow a comprehensive, written inspection plan and must document the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. The plan includes the following elements: (Section 265.15)	—	<u>X</u>	—	—
1. Inspect emergency equipment.	—	<u>X</u>	—	—
2. Inspect monitoring equipment.	—	<u>X</u>	—	—
3. Inspect security, alarm and communications devices.	—	<u>X</u>	—	—
4. Inspect process equipment (pipes, pumps, etc.).	—	<u>X</u>	—	—
5. Inspect containment structures (dikes, curbs, etc.).	—	<u>X</u>	—	—
6. Inspect facility for structural malfunctions (roof, floor, etc.).	—	<u>X</u>	—	—
7. Inspect hazardous waste handling/loading areas each day used.	—	<u>X</u>	—	—
8. Record of any malfunctions due to equipment or operator errors.	—	<u>✓</u>	—	—
9. Record of any hazardous waste discharges.	<u>X</u>	—	—	—
e) The facility has provided a Personnel Training Program in compliance with Section 265.16 (a)(b)(c) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course.	—	<u>X</u>	—	—
f) The facility keeps all records required by Section 265.16(d)(e) including written job titles, job descriptions and documented employee training records.	—	<u>X</u>	—	—

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
g) If required due to the actual hazards associated with Ignitable, Reactive or incompatible waste materials, the facility meets the following requirements (Section 265.17):	_____	_____	<u>X</u>	_____
1. Protection from sources of ignition.	_____	_____	<u>X</u>	_____
2. Physical separation of incompatible waste materials.	_____	_____	<u>X</u>	_____
3. "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.	_____	_____	<u>X</u>	_____
4. Any co-mingling of waste materials is done in a controlled, safe manner as prescribed by Section 265.17(b).	_____	_____	<u>X</u>	_____

REMARKS, SEC. 265, SUBPART B

#1. Process does not change

#2. Not required but inspected.

PART 3. GENERAL INTERIM STATUS REQUIREMENTS

Subpart C: Preparedness and Prevention

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
2. The facility meets all requirements for Preparedness and Prevention in Section 265, Subpart C:				
a) Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31)	<u>X</u>	<u> </u>	<u> </u>	<u># 1</u>
b) If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32)	<u>X</u>	<u> </u>	<u>X</u>	<u>#2</u>
1. Internal alarm system.	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
2. Access to telephone, radio or other device for summoning emergency assistance.	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
3. Portable fire control equipment.	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
4. Water at adequate volume and pressure via hoses sprinklers, foamers or sprayers.	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
c) All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented.	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
d) If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled (Section 265.34)	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
e) If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement of emergency or spill control equipment is maintained (265.35).	<u> </u>	<u> </u>	<u>X</u>	<u> </u>

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
f) If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout (265.37(a)).	<u>X</u>	<u> </u>	<u>X</u>	<u># 2</u>
g) Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented (265.37(b)).	<u> </u>	<u> </u>	<u>X</u>	<u> </u>

Subpart D: Contingency and Emergency

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
3. <u>The facility meets all requirements for Contingency Plan and Emergency Procedures in Section 265, Subpart D.</u>				
a) The facility has a written Contingency Plan designed to minimize hazards from fires, explosions or unplanned releases of hazardous wastes (265.51) and contains the following components:	<u> </u>	<u> </u>	<u> </u>	<u> </u>
1. Actions to be taken by personnel in the event of an emergency incident.	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
2. Arrangements or agreements with local or state emergency authorities.	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
3. Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator.	<u> </u>	<u>X</u>	<u> </u>	<u># 3</u>
4. A list of all emergency equipment including location, physical description and outline of capabilities.	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
5. If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel (Section 265.51(f)).	<u> </u>	<u> </u>	<u>X</u>	<u> </u>

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
b) A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan. (Section 265.53)	<u>X</u>			
c) The plan is revised in response to facility, equipment and personnel changes or failure of the plan (265.54).		<u>X</u>		
d) An emergency coordinator is designated at all times (on-site or on-call), is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan (Section 265.55).	<u>X</u>			
e) If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Section 265.56.	<u>X</u>			

REMARKS, SEC. 265, SUBPARTS C AND D

- #1 JAN 25, 1981 look in HF tank.
- #2. Not required but inspected anyway.
- #3 No addresses

PART 3. GENERAL INTERIM STATUS REQUIREMENTS (Section 265)

Partial Subpart G: Closure For Non-Disposal Facilities (Section 265.110(a))

	Yes	No	N/A	Remark #
4. The facility meets all applicable closure requirements under Section 265, Subpart G for Non-Disposal Facilities:	—	X	—	—
a) A written closure plan is on file at the facility and contains the following elements: (Section 265.112)				
1. A description of how and when the facility will be closed (265.112(a)(1)).	—	X	—	—
2. A description of how any of the applicable closure requirements in other subparts of Section 265 (Tanks-265.197, Surface Impoundments-265.228) will be implemented.	—	—	X	#1
3. An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility.	—	X	—	—
4. A description of steps taken to decontaminate facility equipment.	—	X	—	—
5. A list of dates over which the various phases of closure are expected to be completed.	—	X	—	—
b) The closure plan has been amended, if necessary, in response to changes in facility design or processes.	—	—	X	—
c) The closure plan has been submitted to the regional administrator 180 days prior to beginning the closure process.	—	—	X	—
d) The facility has been closed within the time limits specified by Section 265.113.	—	—	X	—
e) Upon completion of closure all facility equipment and structures were decontaminated and any hazardous residues were properly disposed of (265.114).	—	—	X	—

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
f) Completion of closure has been certified to the regional administrator by the owner/operator and an independent Professional Engineer (265.115).	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
g) The facility has been closed in a manner which minimizes any future problems (265.111).	<u> </u>	<u> </u>	<u>X</u>	<u> </u>

REMARKS, PART 3. SUBPART G, CLOSURE

#1 STORAGE IS IN 55 gal. containers

PART 4. LONG-TERM STORAGE REQUIREMENTS (Section 265)

SUBPARTS INCLUDED

1. Subpart I: Management of Containers
2. Subpart J: Management of Tanks
3. Subpart K: Surface Impoundments
4. Subpart L: Waste Piles

Subpart I: Management of Containers

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The facility meets all requirements for Management of Containers in Section 265, Subpart I:	_____	_____	_____	_____
a) Hazardous wastes are stored in closed containers which are in good physical condition and are compatible with the wastes stored in them (Section 265.171, .172, .173).	<u>X</u>	_____	_____	_____
b) The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented (265.174).	_____	<u>X</u>	_____	_____
<u>NOTE:</u> FACILITIES OPTING FOR LONG TERM STORAGE ARE NOT REQUIRED TO MEET PRE-TRANSPORT LABELING REQUIREMENTS UNTIL THE CONTAINERS ARE ACTUALLY OFFERED FOR TRANSPORT AND ARE NOT REQUIRED TO AFFIX AN ACCUMULATION DATE. (SECTION 262).				
c) Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 meters) from the property line and the general requirements for handling such wastes in Section 265.17 (physical separation, signs and safety) are met (265.176).	_____	_____	<u>X</u>	_____
d) Incompatible waste materials are not placed in the same containers or put in contaminated containers unless it is done under completely controlled and safe conditions as specified in Section 265.17(b). (Section 265.177(a) (b)).	_____	_____	<u>X</u>	_____
e) Containers holding hazardous wastes are never stored near other materials which may interact with the waste in a hazardous manner (Section 265.177(c)).	<u>X</u>	_____	_____	_____

RCRA INTERIM STATUS INSPECTION FORM

PART 4. LONG-TERM STORAGE REQUIREMENTS (Section 265)

Subpart J: Storage in Tanks

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
2. The facility meets all requirements for storage in tanks in Section 265 Subpart J:	_____	_____	_____	_____
a) The tank(s) are operated in compliance with the safety requirements of Section 265.17 and 265.192(b) and are equipped with a waste-feed cutoff or bypass system as required in Section 265.192(d).	_____	_____	_____	_____
b) Uncovered tanks have at least 2 feet (60 cm.) of freeboard <u>unless</u> they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide (265.192(c)).	_____	_____	_____	_____
c) Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard (265.194).	_____	_____	_____	_____
d) Weekly inspections are made of all tank construction materials and containment structures (265.194).	_____	_____	_____	_____
e) Whenever tanks are used to treat or store wastes substantially different from previous wastes or when substantially different treatment processes are used in the tank, the facility has insured the safety of such changes by one or both of the following methods: (Section 265.193(a)).	_____	_____	_____	_____
1. A complete waste analysis plus bench scale tests or pilot tests were conducted prior to implementing the proposed changes and all data is on file in the facility operating record.	_____	_____	_____	_____
2. Written, documented information on similar storage or treatment process changes was obtained prior to implementing the proposed changes and all documentation is on file in the facility operating record.	_____	_____	_____	_____

I - A INTERIM STATUS INSPECTION FC

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
f) With the exception of emergency situations, whenever Ignitable or Reactive wastes are placed in tanks the facility has insured the safety of the operation by one or both of the following methods, (Section 265.198 (a)):	_____	_____	_____	_____
1. The waste is treated immediately before or after being placed in the tank so that it is no longer Ignitable or Reactive and such treatment is done in compliance with the safety requirements of Section 265.17 (b).	_____	_____	_____	_____
2. The waste is stored or treated under protected conditions eliminating the possibility of ignition or reaction.	_____	_____	_____	_____
g) Covered tanks used to treat or store Ignitable or Reactive wastes are in compliance with NFPA buffer zone requirements (Flammable and Combustible Code-1977) (Section 265.198(b)).	_____	_____	_____	_____
h) Incompatible waste materials are not placed in the same tanks or put in contaminated tanks unless it is done under completely controlled and safe conditions as specified in Section 265.17(b) (Section 265.199).	_____	_____	_____	_____
j) Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of (Section 265.197).	_____	_____	_____	_____

REMARKS, PART 4 SUBPART J- TANKS

PART 4. LONG-TERM STORAGE REQUIREMENTS (Section 265)

Subpart K: Surface Impoundments

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
3. The facility meets all requirements for management of wastes in Surface Impoundments in Section 265, Subpart K:	_____	_____	_____	_____
a) The Surface Impoundment is designed to operate with at least 2 feet (60 cm.) of freeboard and has a structural containment system adequate to contain the waste material (Section 265.222).	_____	_____	_____	_____
b) Earthen structural containment systems are equipped with protective cover such as grass, shale or rock to minimize erosion from wind and water (265.22).	_____	_____	_____	_____
c) The level of freeboard in the Surface Impoundment is inspected at least once each operating day, the structural containment system is inspected at least once per week and all such inspections are documented (Section 265.226).	_____	_____	_____	_____
d) Has the facility ever recorded an unplanned release of hazardous waste from the Surface Impoundment(s)? (Section 265.15)	_____	_____	_____	_____
e) Whenever Surface Impoundments are used to treat or store wastes substantially different from previous wastes or when substantially different treatment processes are used in the Surface Impoundment, the facility has insured the safety of such changes by one or both of the following methods (265.225):	_____	_____	_____	_____
1. A complete waste analysis plus bench scale or pilot tests were conducted prior to implementing the proposed changes and all data is on file in the facility operating record.	_____	_____	_____	_____
2. Written, documented information on similar storage or treatment process changes was obtained prior to implementing the proposed changes and all documentation is on file in the facility operating record.	_____	_____	_____	_____

RCRA INTERIM STATUS INSPECTION JRM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
f) With the exception of emergency situations, whenever Ignitable or Reactive wastes are placed in Surface Impoundments the facility has insured the safety of the operation by the following method (Section 265.229):	_____	_____	_____	_____
1. The waste is treated immediately after placement in the Surface Impoundment so that it is no longer Ignitable or Reactive and such treatment is done in compliance with the safety requirements of Section 265.17(b).	_____	_____	_____	_____
g) Incompatible materials are never placed in the same Surface Impoundment unless it is done in compliance with the safety requirements of Section 265.17(b) (Section 265.230).	_____	_____	_____	_____
h) As required by Subpart F, Section 265.90, (Ground Water Monitoring) the facility has implemented a ground water monitoring program capable of determining the impact of the Surface Impoundment(s) on the quality of the ground water in the uppermost aquifer underlying the facility.	_____	_____	_____	_____
j) In lieu of a ground water monitoring program, the operator has a written demonstration that there is a low potential for migration of hazardous waste or constituents via ground or surface waters which has been certified in writing by a qualified geologist in compliance with Section 265.90(c).	_____	_____	_____	_____
k) Upon closure of the Surface Impoundment, the operator intends to remove all wastes, residues, liners and any contaminated soil as required by Section 265.228 in order to exempt the Surface Impoundment from further regulation under Section 265.	_____	_____	_____	_____

NOTE: IF THE OPERATOR ELECTS NOT TO EXEMPT THE SURFACE IMPOUNDMENT FROM FURTHER REGULATION BY REMOVING ALL WASTE MATERIALS, THE SURFACE IMPOUNDMENT IS SUBJECT TO THE POST-CLOSURE CARE AND GROUNDWATER MONITORING REQUIREMENTS SPECIFIED IN SUBPART G FOR DISPOSAL FACILITIES AND SUBPART N, SECTION 265.310 FOR LANDFILLS. (SECTION 265.228(e)).

PART 4. LONG-TERM STORAGE REQUIREMENTS (Section 265)

Subpart L: Storage in Waste Piles

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
4. The facility meets all requirements for storage in Waste Piles in Section 265, Subpart L:	_____	_____	_____	_____
a) Waste materials which are subject to dispersal by wind have been adequately protected against such dispersal (Section 265.251).	_____	_____	_____	_____
b) If leachate or runoff from a Waste Pile would be a hazardous waste, then one or more of the following steps have been taken to prevent or properly manage the situation (Section 265.253).	_____	_____	_____	_____
1. The pile has been placed on an impermeable base, run-on has been diverted away from the pile and any leachate or runoff is collected and managed as a hazardous waste.	_____	_____	_____	_____
2. The pile has been protected from precipitation and run-on in a manner which prevents the generation of leachate and runoff.	_____	_____	_____	_____
3. No liquids or wastes containing free liquids are placed in the pile.	_____	_____	_____	_____
c) No new waste materials are added to an existing Waste Pile without first ascertaining that the material is compatible with the existing waste by conducting appropriate laboratory tests, which are documented in the facility operating record (Section 265.252).	_____	_____	_____	_____
d) Ignitable or Reactive waste materials are not placed in Waste Piles unless one or both of the following conditions are met (Section 265.256):	_____	_____	_____	_____

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The addition to the pile results in a mixture which no longer meets the definition of Ignitable or Reactive and was done in compliance with the safety requirements of Section 265.17(b).	<u> </u>	<u> </u>	<u> </u>	<u> </u>
2. The Ignitable or Reactive material is physically or otherwise protected from conditions which may cause ignition or reaction.	<u> </u>	<u> </u>	<u> </u>	<u> </u>
e) Incompatible materials are never placed in the same Waste Pile or near areas containing residues of a incompatible material unless it is done in compliance with the safety requirements of Section 265.17(b) (Section 265.257(a)(c).	<u> </u>	<u> </u>	<u> </u>	<u> </u>
f) Piles of hazardous waste are never stored near other materials which may interact with the waste in a hazardous manner (Section 265.257(b).	<u> </u>	<u> </u>	<u> </u>	<u> </u>

REMARKS, PART 4 - SUBPART L, WASTE PILES

**F.1 Imagery/Special
Studies**